NOTICE OF COMPLIANCE/NON-COMPLIANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Waste Management Program

Initial Inspection: (Yes) No Follow-up Inspection: Yes (No) Complaint: Yes (No)
Hazardous Waste: LDF ( ) TSF (X) GEN (X) KG ( ) SQ ( ) UNV ( ) NOT A GEN ( ) OTHER ( )_____
Used Oil: UOG ( ) UOT ( ) UOM ( ) UOP ( ) UOB ( )
Solid Waste: SLF ( ) TRS ( ) CDL ( ) ILF ( ) YWC ( ) SWP ( ) HHW ( ) OBS ( ) MTP ( ) WTM ( ) WTP ( ) WTR ( ) WTT ( )

TO: Clean Harbors Kansas LLC (Facility Name) 8 / 11 / 05 (Date)

2549 N. New York (Address) Wichita (City) KS (State) 67219 (Zip Code) Sedgwick (County)

KSD007246846
EPA Identification No.

472470
RCRA RECORDS

This inspection was conducted to determine compliance with the state and federal solid an 15

(X) Violations As Follows

Citation	Description of Violation
* (1) KAR 28-31-4(g)(2)	Failure to mark or label a 55-gallon storage drum with an accumulation start date.
(2) Permit Part I, Section III.E., [40CFR264 subpart I]	Failure to manage a 5-gallon storage container properly [not labeled hazardous waste, open, not labeled with an accumalation start date and storing hazardous waste over 90 days]

(X) Other Comments/Concerns:

(A) Manifest: Initial all changes on the manifest.
(B) Laboratory: Clean-out materials inside the fume hood
* Corrected during the inspection

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within 30 days of receipt of this notice a description of all corrective actions taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Your response must be submitted to:
Debbie Travis
Kansas Department of Health and Environment
South Central District Office
Waste Management Program
130 S. Market, Suite 6050
Wichita, Kansas 67202-3802

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (316) 337-6020 or Bureau of Waste Management in the Topeka office at (785) 296-1600.

This Notice was prepared by:
Debbie Travis
Date 8, 11, 05

I, the undersigned hereby acknowledge that I have received and read this Notice.
Printed Name: C. Brian Key
Signature: Charles Brian Key
Title: Technical Services General Manager
Date 8 / 11 / 05

COPIES: White-Facility; Yellow-Bureau of Waste Management; Blue-District

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

BUREAU OF WASTE MANAGEMENT
BUREAU OF ENVIRONMENTAL FIELD SERVICES

COMPLIANCE INSPECTION CHECKLIST COVER PAGE

General ☒ **Routine** ☐ **Complaint**

EPA/ ID/Permit No. KSD 007 246 846 Time 9:00 a.m. Date 8/10&11/05

Facility Name Clean Harbors Kansas LLC District Southcentral

Street 2549 N. New York City Wichita ,KS ZIP 67219

Mailing Address (if different than above) same

County Sedgwick Number of Employees 20

Phone 316-269-7400 & 602-462-2315 Fax 316-269-7455
e-mail key.brian@cleanharbors.com

Contact(s) C. Brian Key, Technical Service Manager, Lon Stewart, Site Contact is located in Phoenix, AZ
Inspector(s) Debbie Travis

Type of Business Hazardous Waste Transfer Facility

Operating Hours and Days 8:00 a.m. to 5:00 p.m., Monday through Friday

Lat/Long Location Method: GPS Garmin III Lat/Long Location Feature: Entrance

Latitude: (e.g. 37.57621) 37.72894 Longitude: (e.g. -101.57621) -97.31817

Has the Lat/Long been entered in the SW database? Yes ☐ No ☒

Hazardous Waste Inspection: ☒ Yes ☐ No

Generator Classification: ☐ Closed/Inactive ☐ Small Qty. Generator ☒ EPA Generator
☐ Not a Generator ☐ Kansas Generator ☒ Transporter

Other Regulated Activities: ☒ T/S/D Facility ☒ Tank System ☐ Subpart BB
(complete applicable checklist) ☒ Universal Waste Activities

Has the company declared any information/processes as trade secrets KSA 65-3447? NO
If yes, explain:

If facility is closed/inactive, or has recently moved please provide a brief description.

Used Oil Activities: ☐ Yes ☒ No

Does the facility have a total above-ground storage capacity of used oil (excluding containers less than 55-gallons) of more than 1,320 gallons? ☐ Yes ☐ No
If yes, then the facility is subject to SPCC requirements due to used oil activities.

Facility Used Oil Activities (Attach a checklist for each one marked):

☐ Generator
☐ Transporter / Transfer Facility
☐ Used Oil Burner (Off-Spec Fuel)
☐ Collection Center / Aggregation Point
☐ Used Oil Processor / Re-Refiner
☐ Used Oil Marketer

Attach all applicable checklists.

HAZARDOUS WASTE GENERATOR
COMPLIANCE INSPECTION CHECKLIST

INDUSTRIAL WASTES GENERATED

List all hazardous wastes first, then list solid wastes.

Waste description or process	If waste is hazardous, list all HW ID numbers	Amount generated per month	Amount presently in storage	Oldest accumulation start date	Recycling or disposal method
Solids (PPE, floor debris, damaged containers, and spill clean-up	D001, D018, D035, F003, F005	~ 10 P	None	N/a	Clean Harbors Kimball, NE
Liquid (contaminated water)	D004, D005, D006, D007, D008, D009, D010, D011, D018, D020 through D029, D035, D039, D040	2400 P	40-gallons	Na	Systech Environmental Fredonia, KS
Flammable Corrosive Solids	D001, D002	Varies	None	Na	Clean Harbors La Porte, TX
Mercury	D009	25 P site clean out	None	Na	Clean Harbors Chicago, IL
Sulfuric Acid	D002	425 P site clean out	None	Na	Clean Harbors Cleveland, OH
Fluorescent Lamps	D009	25 P / year	None	Na	Clean Harbors Chicago, IL
Well Purge Water	Non-Hazardous	2000 P / quarter	None	Na	Clean Harbors Waynoka, Ok
Well Soil Cutting	Non-Hazardous	500 P / quarter	None	Na	Clean Harbors
Solid Waste (trash)	Non-Hazardous	Varies	None	Na	Waste Connections

GENERAL REQUIREMENTS (GGR)

	YES	NO	NAV#
1. Has the generator evaluated each potentially hazardous waste to determine if it is hazardous? **KAR 28-31-4(b) [255]**	☒	☐	
a. If waste was tested, was the analysis conducted by a laboratory certified by KDHE? **KAR 28-31-4(b)(3)(A) [256]**	☒	☐	☐
b. If waste was tested, are the results kept for three years from date the waste was last sent for on-site or off-site for treatment, storage or disposal? **KAR 28-31-4(f)(1)(C) [257]**	☒	☐	☐
c. If waste was not tested, did the generator use knowledge of the hazardous characteristics of the waste in light of the materials or processes used? **KAR 28-31-4(b)**	☒	☐	☐
2. If hazardous waste is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW), has the generator received written approval from the City - POTW?	☐	☐	☒
3. Has the facility obtained a Special Waste Disposal Authorization (SWDA) for each special waste? **KAR 28-29-109(c) [258]**	☐	☐	☒
a. List each SWDA authorization number: _____			
4. If the generator treats or recycles hazardous waste on-site (such as in a still), do they count waste each time prior to being treated or recycled? **KAR 28-31-4(o) [259]**	☐	☐	☒
a. If the waste is not counted, is it exempt because of a closed-loop system?	☐	☐	☒

GENERAL REQUIREMENTS: ☒ **Compliance** ☐ **Non-Compliance** ☐ **NA**

NOTIFICATION REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GGR)

5. Has generator notified KDHE and obtained an EPA Identification Number? **KAR 28-31-4(c)(1) [263]**	☒	☐	
6. Is current notification accurate? **KAR 28-31-4(c)(1) [264]**	☒	☐	☐

NOTIFICATION REQUIREMENTS: ☒ **Compliance** ☐ **Non-Compliance** ☐ **NA**

NON-ACCUMULATING SMALL QUANTITY GENERATOR REQUIREMENTS

	YES	NO	NAV#
7. If the SQG is accumulating less than 55 pounds (25 kg.) of hazardous waste on-site,			
a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? **KAR 28-31-4(m)(2) [268]**	☐	☐	☐
b. Is the SQG sending this waste off-site for treatment, storage, or disposal? **KAR 28-31-4(m)(2) [269]**	☐	☐	☐

NON-ACCUMULATING SQG REQUIREMENTS: ☐ Compliance ☐ Non-Compliance ☒ NA

 (If small quantity generator not accumulating, stop here)

ACCUMULATING SMALL QUANTITY GENERATOR REQUIREMENTS

8. If the SQG is accumulating 55 pounds (25 kg.) or more of hazardous waste,			
a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? **KAR 28-31-4(m)(2) [268]**	☐	☐	☐
b. If the SQG is sending waste off-site for treatment, storage, or disposal, is the waste sent to a TSD or some other approved waste management facility? **KAR 28-31-4(m)(2) [269]**	☐	☐	☐

ACCUMULATING SQG REQUIREMENTS: ☐ Compliance ☐ Non-Compliance ☒ NA

PRE-TRANSPORT REQUIREMENTS (GPT)

9. Does generator package **[273]**, label **[274]** (flammable liquid, poison, etc.), and mark **[275]** (consignee's or consignor's name and address, etc.) waste in accordance with the requirements outlined in 49 CFR Parts 172, 173, 178, and 179 (DOT)? **KAR 28-31-4(e) [276]**	☒	☐	
a. Does the generator mark each container of 110 gallons or less as shown below? **KAR 28-31-4(e)(3)(B) [277]**	☒	☐	☐

Hazardous Waste-Federal Law Prohibits Improper Disposal.
If found, contact the nearest police or public safety authority or the US EPA.
Generator's Name and Address
Manifest Document Number

10. Does the generator only use a transporter who has registered with KDHE and obtained an EPA Identification Number? **KAR 28-31-4(c)(2) [278]**	☒	☐	

PRE-TRANSPORT REQUIREMENTS: ☒ Compliance ☐ Non-Compliance ☐ NA

Storage Requirements (GPT)

	YES	NO	NAV#
11. If the generator temporarily stores waste in containers,			
a. Is the accumulation start date marked on each container? **KAR 28-31-4(g)(2) [303] or KAR 28-31-4(h)(3) [291] or KAR 28-31-4(m)(2)(B) [282]**	☐	☒	1
b. Is each container clearly marked with the words "Hazardous Waste"? **KAR 28-31-4(g)(3) [304] or KAR 28-31-4(h)(4) [292] or KAR 28-31-4(m)(2)(B) [283]**	☒	☐	
c. Are all containers holding hazardous waste in good condition **[305, 293, 284]** and closed **[306, 294, 285]** during storage except when necessary to add or remove waste? **KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A) or KAR 28-31-4(m)(2)(B)**	☒	☐	
d. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? **KAR 28-31-4(g)(1)(A) [307] or KAR 28-31-4(h)(2)(A) [295] or KAR 28-31-4(m)(2)(B) [286]**	☒	☐	
A. If yes, are these inspections documented in a log that includes complete date and time of inspection, name of inspector, notations of observations, and date and nature of remedial actions? **KAR 28-31-4(k) [308, 296, 287]**	☒	☐	
12. If SQG or Kansas generator is accumulating 2,200 lbs. (1,000 kg.) or more of hazardous waste or 2.2 lbs (1 kg.) or more of acutely hazardous waste, then check yes and continue with EPA generator requirements.	☐	☐	na

STORAGE REQUIREMENTS	☐ Compliance	☒ Non-Compliance	☐ NA

(If small quantity generator accumulating <1,000 Kilograms, stop here)

STORAGE REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GPT)

		YES	NO	NAV#
13.	If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? **KAR 28-31-4(g)(1)(A) [311] or KAR 28-31-4(h)(2)(A) [299]**	☒	☐	☐
14.	Is EPA generator storing hazardous waste for 90 days or less? **KSA 65-3441(a)(2) [312]**	☒	☐	☐
15.	Are containers holding ignitible or reactive waste(s) located at least 50 feet (15 meters) from the generator's property line? (EPA Generator Only) **KAR 28-31-4(g)(1)(A) [313]**	☒	☐	☐

If waste is managed in a tank system, complete the tank checklist. Complete Subpart BB checklist if organic waste contacts piping, valves, pumps, etc. (See 40 CFR 265.1050 for applicability)

STORAGE REQUIREMENTS:	☒ Compliance	☐ Non-Compliance	☐ NA

SATELLITE ACCUMULATION REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GPT)

16.	If the Kansas or EPA generator has satellite accumulation areas,			
a.	Is 55-gallons or less of each waste stream **[317]** accumulated at or near the point of generation **[318]**, in one container **[319]**, which is under the control of the operator of the process generating that waste **[320]**? **KAR 28-31-4(j)(1)**	☒	☐	
b.	Is each container in good condition **[321]** and closed except to add or remove waste **[322]**? **KAR 28-31-4(j)(1)(A)**	☒	☐	
c.	Is each container marked with the words "Hazardous Waste"? **KAR 28-31-4(j)(1)(B) [323]**	☒	☐	
d.	Is each container marked with the accumulation start date at the time more than 55-gallons is accumulated, or an additional container is started for the same waste stream? **KAR 28-31-4(j)(2) [324]**	☐	☐	☒
e.	Is each container managed as a storage container within three days of no longer meeting the definition of a satellite container? **KAR 28-31-4(j)(2) [325]**	☐	☐	☒

SATELLITE ACCUMULATION REQUIREMENTS	☒ Compliance	☐ Non-Compliance	☐ NA

MANIFESTS REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GMR)

	YES	NO	NAV#
17. If a contractual agreement is used in place of manifesting? (Kansas Generators only)			
a. Does the contractual agreement include the type of waste and frequency of shipments? **KAR 28-31-4(d)(7)(A) [329]**	☐	☐	☒
b. Is the vehicle used to transport the waste owned and operated by the reclaimer of the waste? **KAR 28-31-4(d)(7)(B) [330]**	☐	☐	☒
c. Is a copy of the agreement kept for a period of three years after termination of agreement? **KAR 28-31-4(d)(7)(C) [331]**	☐	☐	☒
18. If required, is a hazardous waste manifest used? **KAR 28-31-4(d)(1) [335]**	☐	☐	☒
a. If yes, does each manifest include:			
1. Generator EPA identification number (12-digit) **[336]** and a unique 5-digit manifest document number **[337]**? **KAR 28-31-4(d)(1)**	☒	☐	
2. Number of pages? **KAR 28-31-4(d)(1) [338]**	☒	☐	
3. Generator's name and mailing address? **KAR 28-31-4(d)(1) [339]**	☒	☐	
4. Generator's phone number? **KAR 28-31-4(d)(1) [340]**	☒	☐	
5. Each transporter's name? **KAR 28-31-4(d)(1) [341]**	☒	☐	
6. Each transporter's EPA identification number? **KAR 28-31-4(d)(1) [342]**	☒	☐	
7. Name and site address of designated facility? **KAR 28-31-4(d)(1)(A) [343]**	☒	☐	
8. Designated facility's EPA identification number? **KAR 28-31-4(d)(1) [344]**	☒	☐	
9. Waste description (DOT shipping name, hazard class, packing group and identification number)? **KAR 28-31-4(d)(1) [345]**	☒	☐	
i. For waste using a "n.o.s." description, are the requirements of 49 CFR 172.203(k) met? **KAR 28-31-4(d)(1) [346]**	☒	☐	☐
10. Number **[347]** and type of containers? **KAR 28-31-4(d)(1) [348]**	☒	☐	
11. Total quantity? **KAR 28-31-4(d)(1) [349]**	☒	☐	
12. Unit (weight or volume)? **KAR 28-31-4(d)(1) [350]**	☒	☐	
13. Special handling instructions (if applicable)? **KAR 28-31-4(d)(1) [351]**	☒	☐	
14. Generator's certification including waste minimization statement **[352]**, generator's signature **[353]** and date **[354]**? **KAR 28-31-4(d)(4)(A)**	☒	☐	
15. Name **[355]**, signature **[356]**, and date **[357]** of initial transporter? **KAR 28-31-4(d)(4)(B)**	☒	☐	
b. Does generator retain a copy of each initial manifest signed and dated by both generator and transporter? **KAR 28-31-4(d)(4)(C) [358]**	☒	☐	☐
c. Does generator retain a copy of each manifest for three years that was signed and dated by a representative of the designated facility? **KAR 28-31-4(f)(1)(A) [359]**	☒	☐	☐
d. If generator has failed to receive a signed copy of a manifest within 45 days of initiating a shipment, was an exception report filed? **KAR 28-31-4(f)(4)(B) [360]**	☐	☐	☒
1. If yes, was a copy retained for three years? **KAR 28-31-4(f)(1)(B) [361]**	☐	☐	☒

MANIFESTING REQUIREMENTS ☒ **Compliance** ☐ **Non-Compliance** ☐ **NA**

LAND DISPOSAL RESTRICTION REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GLB)

		YES	NO	NA	V#
19.	If the generator's waste is **not** subject to the Land Disposal Restrictions regulations, please explain why: _____				
20.	If the generator sent waste **not meeting** the treatment standards to an off-site treatment or storage facility, did the generator provide a one-time written notice with the initial shipment of each different waste stream? **K.A.R. 28-31-14/40 CFR 268.7(a)(2) [365]**	☒	☐	☐	
	1. Did the notice include: EPA hazardous waste number [366], manifest number **[367]**, F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored) **[368]**, wastewater or non-wastewater classification **[369]**, waste subcategory (if any) **[370]**, and waste analysis data, if available **[371]**? **K.A.R. 28-31-14/40 CFR 268.7(a)(2)**	☒	☐	☐	
21.	If the generator sent waste **meeting** the treatment standards to an off-site treatment, storage facility, or disposal facility, did the generator provide a one-time written notice and signed certification statement with the initial shipment to each TSD receiving the waste which certified the waste met the applicable treatment standards? **K.A.R. 28-31-14/40 CFR 268.7(a)(3) [372]**	☐	☐	☒	
	1. Did the notice include: EPA hazardous waste number [366], manifest number **[367]**, F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored) **[368]**, wastewater or non-wastewater classification **[369]**, waste subcategory (if any) **[370]**, and waste analysis data, if available **[371]**? **K.A.R. 28-31-14/40 CFR 268.7(a)(2)**	☐	☐	☒	
22.	If the generator treated waste in tanks or containers to meet applicable treatment standards:				
	a. Did the generator have a written waste analysis plan on-site describing procedures used to comply with the treatment standards? **K.A.R. 28-31-14/40 CFR 268.7(a)(5) [373]**	☐	☐	☒	
	b. If the generator sent the treated waste off-site, did the generator provide a notice and signed certification statement with the initial shipment? K.A.R. 28-31-14/40 **CFR 268.7(a)(5)(iii) [374]**	☐	☐	☒	
23.	Has the generator retained copies of all notices, certifications, waste analysis data, and other documents for at least 3 years from the last date the corresponding waste was last managed on-site or shipped off-site? **K.A.R. 28-31-14/40 CFR 268.7(a)(8) [375]**	☐	☐	☐	
24.	If the generator claims that his characteristic waste, including all applicable underlying hazardous constituents, is no longer hazardous:				
	a. Did the generator submit a one-time notice and signed certification to the KDHE and retain a copy for their files? **K.A.R. 28-31-14/40 CFR 268.9(d) [376]**	☐	☐	☒	
	b. Is the information on the notice and certification current? **K.A.R. 28-31-14/40 CFR 268.9(d) [377]**	☐	☐	☒	

Note: If a generator's waste is subject to any Land Disposal Restriction regulations not covered above, then please discuss these situations in the summary.

LDR REQUIREMENTS:	☒ Compliance	☐ Non-Compliance	☐ NA

SPECIAL CONDITIONS (GSC)

	YES	NO	NA	V#
25. If the generator has shipped/received hazardous waste to/from a foreign source, did they comply with the requirements of 40 CFR 262.53 and/or 40 CFR 262.54?	☐	☐	☐	

If hazardous waste was shipped/received to/from a foreign source, please describe in summary.

SPECIAL CONDITIONS REQUIREMENTS: ☐ Compliance ☐ Non-Compliance ☒ NA

KANSAS GENERATOR'S EMERGENCY PREPAREDNESS REQUIREMENTS (GPT)

26. Has generator designated at least one employee as an emergency coordinator? **KAR 28-31-4(h)(6) [381]** ☐ ☐
    a. Is the emergency coordinator on the premises or available to respond to an emergency by reaching the facility within a short period of time? **KAR 28-31-4(h)(6) [382]** ☐ ☐
    b. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? **KAR 28-31-4(h)(9) [383]** ☐ ☐

27. Is the following information posted next to at least one telephone which is accessible with little or no delay in an emergency? **KAR 28-31-4(h)(7) [384]**
    a. Name and telephone number of emergency coordinator(s)? **KAR 28-31-4(h)(7)(A) [385]** ☐ ☐
    b. Location of fire extinguishers and spill-control material, and if available, fire alarms? **KAR 28-31-4(h)(7)(B) [386]** ☐ ☐
    c. Telephone number of fire department unless facility has a direct alarm (911 is acceptable)? **KAR 28-31-4(h)(7)(C) [387]** ☐ ☐

28. Have employees been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? **KAR 28-31-4(h)(8) [388]** ☐ ☐

KS GEN.'S EMERGENCY PREPAREDENSS REQ. ☐ Compliance ☐ Non-Compliance ☒ NA

HAZARDOUS WASTE REPORTING REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GRR)

29. Has Kansas or EPA generator submitted an annual monitoring fee and report to KDHE? **KAR 28-31-10(g)(1) [396] or KAR 28-31-10(g)(3) [392]** ☒ ☐

30. Has EPA generator submitted a biennial report(s) to KDHE? **KAR 28-31-4(f)(2)(A) [397]** ☒ ☐ ☐
    a. Does generator retain a copy of the report for three years? **KAR 28-31-4(f)(1)(B) [398]** ☒ ☐ ☐

HAZARDOUS WASTE REPORTING REQUIREMENTS ☒ Compliance ☐ Non-Compliance ☐ NA

PREPAREDNESS AND PREVENTION REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GPT)

		YES	NO	NA	V#
31.	Has the generator maintained and operated the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents? **K.A.R. 28-31-4(g)(4) [418] or K.A.R. 28-31-4(h)(5)/40 CFR 265.31 [402]**	☒	☐	☐	
32.	**If appropriate**, based upon the nature and quantity of each waste generated and stored at the facility, is the facility equipped with:				
	a. Internal communication or alarm system easily accessible in case of emergency? **K.A.R. 28-31-4(g)(4) [419] or K.A.R. 28-31-4(h)(5)/40 CFR 265.32(a) [403]**	☒	☐	☐	
	b. Telephone or hand-held two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? **K.A.R. 28-31-4(g)(4) [420] or K.A.R. 28-31-4(h)(5)/40 CFR 265.32(b) [404]**	☒	☐	☐	
	c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? **K.A.R. 28-31-4(g)(4) [421] or K.A.R. 28-31-4(h)(5)/ 40 CFR 265.32(c) [405]**	☒	☐	☐	
	d. Water of adequate volume and pressure to supply hose streams, foam producing equipment, automatic sprinklers, and water spray systems? **K.A.R. 28-31-4(g)(4) [422] or K.A.R. 28-31-4(h)(5)/40 CFR 265.32(d) [406]**	☒	☐	☐	
33.	Is the equipment (32a-32c above) tested and maintained to ensure its proper operation? **K.A.R. 28-31-4(g)(4) [423] or K.A.R. 28-31-4(h)(5)/40 CFR 265.33 [407]**	☒	☐	☐	
34.	Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? **K.A.R. 28-31-4(g)(4) [424] or K.A.R. 28-31-4(h)(5)/40 CFR 265.35 [408]**	☒	☐	☐	
35.	**As appropriate**, for each type of waste handled, has the generator attempted to make the following arrangements:				
	a. Familiarized the local emergency authorities with the facility, properties and hazards of each waste handled, locations of workers, entrances to facility roads and possible evacuation routes? **K.A.R. 28-31-4(g)(4) [425] or K.A.R. 28-31-4(h)(5)/40 CFR 265.37(a)(1) [409]**	☒	☐	☐	
	b. Designated one authority where one or more police or fire departments might respond to an emergency? **K.A.R. 28-31-4(g)(4) [426] or K.A.R. 28-31-4(h)(5)/ 40 CFR 265.37(a)(2) [410]**	☒	☐	☐	
	c. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? **K.A.R. 28-31-4(g)(4) [427] or K.A.R. 28-31-4(h)(5)/40 CFR 265.37(a)(3) [411]**	☒	☐	☐	
	d. Familiarized local hospitals with the properties of hazardous waste handled and types of injuries or illness which could result from fires, explosions, or releases at the facility? **K.A.R. 28-31-4(g)(4) [428] or K.A.R. 28-31-4(h)(5)/40 CFR 265.37(a)(4) [412]**	☒	☐	☐	
36.	Do personnel have immediate access to an internal alarm or emergency communications device, either directly or through visual or contact with another employee, when handling hazardous waste (unless such a device is not required under § 265.32)? **K.A.R. 28-31-4(g)(4) [429] or K.A.R. 28-31-4(h)(5)/40 CFR 265.34 [413]**	☒	☐	☐	
37.	In cases where local authorities decline to enter into such arrangements, is the refusal documented? **K.A.R. 28-31-4(g)(4) [430] or K.A.R. 28-31-4(h)(5)/40 CFR 265.37(b) [414]**	☐	☐	☒	

PREPAREDNESS AND PREVENTION REQUIREMENTS: ☒ **Compliance** ☐ **Non-Compliance** ☐ **NA**

PERSONNEL TRAINING FOR EPA GENERATORS (GPT)

	YES	NO	NA	V#
38. Has the generator established a hazardous waste management training program? **K.A.R. 28-31-4(g)(4)/40 CFR 265.16(a)(1) [434]**	☒	☐		
a. Is the program directed by a person trained in hazardous waste management? **K.A.R. 28-31-4(g)(4)/40 CFR 265.16(a)(2) [435]**	☒	☐		
b. Are new personnel trained within six months after their employment or placement to a new position? **K.A.R. 28-31-4(g)(4)/40 CFR 265.16(b) [436]**	☒	☐		
c. Are new employees supervised until training is completed? **K.A.R. 28-31-4(g)(4)/40 CFR 265.16(b) [437]**	☒	☐		
d. After initial training, are employees trained on an annual basis? **K.A.R. 28-31-4(g)(4)/40 CFR 265.16(c) [438]**	☒	☐		
e. Does the generator maintain the following documents and records:				
1. Job title for each position related to hazardous waste management and the name of the employee filling each job? **K.A.R. 28-31-4(g)(4)/40 CFR 265.16(d)(1) [439]**	☒	☐		
2. Written job description for each position? **K.A.R. 28-31-4(g)(4)/40 CFR 265.16(d)(2) [440]**	☒	☐		
3. Description of type and amount of both introductory and continuing training to be given each person, including the implementation of the contingency plan? **K.A.R. 28-31-4(g)(4)/40 CFR 265.16(d)(3) [441]**	☒	☐		
4. Records of training or job experience completed by facility personnel? **K.A.R. 28-31-4(g)(4)/40 CFR 265.16(d)(4) [442]**	☒	☐		
5. Are training records kept on all current employees until closure of all hazardous waste units and all past employees for three years from last date of employment? **K.A.R. 28-31-4(g)(4)/40 CFR 265.16(e) [443]**	☒	☐		

PERSONNEL TRAINING REQUIREMENTS: ☒ **Compliance** ☐ **Non-Compliance** ☐ **NA**

CONTINGENCY PLAN FOR EPA GENERATORS (GPT)

	YES	NO	NA	V#
39. Does the generator have a contingency plan? **K.A.R. 28-31-4(g)(4)/40 CFR 265.51(a) [447]**	☒	☐		
If yes,				
a. Does the plan list the name, home address, and phone numbers (home and office) of each designated emergency coordinator in the order in which they should be contacted? **K.A.R. 28-31-4(g)(4)/40 CFR 265.52(d) [448]**	☒	☐		
b. Is an emergency coordinator available at all times? **K.A.R. 28-31-4(g)(4)/40 CFR 265.55 [449]**	☒	☐		
c. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? **K.A.R. 28-31-4(g)(4)/40 CFR 265.52(a) [450]**	☒	☐		
d. Does the plan describe arrangements made with police, fire departments, hospitals, contractors, or any emergency response agency? **K.A.R. 28-31-4(g)(4)/40 CFR 265.52(c) [451]**	☒	☐		
e. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of the capabilities of each item? **K.A.R. 28-31-4(g)(4)/40 CFR 265.52(e) [452]**	☒	☐		
f. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? **K.A.R. 28-31-4(g)(4)/40 CFR 265.52(f) [453]**	☒	☐		
g. Have copies of the plan and any revisions been provided to the police and fire departments, hospitals, and any emergency response agency that may respond to an emergency? **K.A.R. 28-31-4(g)(4)/40 CFR 265.53(b) [454]**	☒	☐		
h. If implementation of the plan has been required at the facility, did the generator submit a written report on the incident to the KDHE within 15 days after the incident? **K.A.R. 28-31-4(g)(4)/40 CFR 265.56(j) [455]**	☐	☐		**na**

CONTINGENCY PLAN REQUIREMENTS: ☒ **Compliance** ☐ **Non-Compliance** ☐ **NA**

(If EPA generator, stop here.)

V# = Violation Number
SC = See Comments
GENLIST 10-27-04.doc: Generator Checklist Revised October 27, 2004

ADDITIONAL INFORMATION AND CONCLUSIONS:

Other items:

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE T/S/D FACILITY
COMPLIANCE INSPECTION CHECKLIST

(NOTE: Permit conditions take precedence over requirements set forth in this checklist.)

General

EPA ID KSD 007 246 846 Time _____ Date August 10 and 11, 2005

Facility Name Clean Harbors Kansas, LLC District SCDO

Street 2549 N. New York City Wichita Kansas Zip 67219

Mailing Address (if different than above) P.O.Box 1875

County Sedgwick Phone 316 269-7400

Contact(s) C. Brian Key, Technical Services General Manager

Inspector(s) Debbie Travis SIC: _____

Type of Business Hazardous Waste Transfer Facility Number of Employees 12

Has the company declared any information/process as trade secrets (KSA 65-3447)? NO
If yes, explain:

Activity at Site

Treatment
[ ] Chem/Phys/Bio Treatment
[ ] Containment Building
[ ] Filtration
[ ] Incineration
[ ] Recycling/Recovery
[ ] Reprocessing
[ ] Thermal Treatment
[ ] Volume Reduction
[ ] Other _____

Storage
[ ] Containment Building
[X] Drums
[ ] Pile
[ ] Surface Impoundment
[X] Tank(s) (complete applicable checklist)
[X] Other _____

Disposal
[ ] Deep Well Injection
[ ] Incineration
[ ] Landfill
[ ] Land Treatment
[ ] Surface Impoundment
[ ] Other _____

Comments:

Waste Analysis Plan (DGS)

	YES	NO	NA
1 Does facility maintain a copy of its waste analysis plan at the facility? [264.13(b)/265.13(b)]	[X]	[ ]	[ ]
a. If yes, does the plan include:			
A. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [(264.13(b)(1)/265.13(b)1)]	[X]	[ ]	
B. Test methods which are used to test for these parameters? [264.13(b)(2)/265.13(b)(2)]	[X]	[ ]	
C. Sampling method used to obtain sample? [264.13(b)(3)/265.13(b)(3)]	[X]	[ ]	
D. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current? [264.13(b)(4)/265.13(b)(4)]	[X]	[ ]	
E. For off-site facilities, the waste analyses that generators have agreed to supply? [264.13(b)(5)/265.13(b)(5)]	[X]	[ ]	[ ]
F. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identify of the waste designated on the manifest? [264.13(c)/265.13(c)]	[X]	[ ]	[ ]

Waste Analysis Plan Requirements: [X] Compliance [ ] Non-Compliance [ ] N/A

Security (DGS)

2 Does the facility consider itself exempt from the security requirements as provided in 264.14(a)(1)&(2)/265.14(a)(1)&(2)?	[ ]	[X]	
If no,			
a. Does the facility provide either of the following:			
A. A 24-hour surveillance system (TV monitoring or guards)? [264.14(b)(1)/265.14(b)(1)]; OR	[ ]	[X]	[ ]
B. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, TV monitoring, locked entrance, controlled roadway access)? [264.14(b)(2)/265.14(b)(2)]	[X]	[ ]	[ ]
b. Has the facility posted warning signs at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to the active portion? [264.14(c)/265.14(c)]	[X]	[ ]	

Security Requirements: [X] Compliance [ ] Non-Compliance [ ] N/A

General Inspection Requirements (DGS)

3 Does the owner/operator follow a written schedule at the facility for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment? [264.15(b)(1)/265.15(b)(1)]	[X]	[ ]
4 Does the owner/operator keep the written inspection schedule at the facility? [264.15(b)(2)/265.15(b)(2)]	[X]	[ ]
5 Does the written inspection schedule identify the types of problems which are to be looked for during the inspections? [264.15(b)(3)/265.15(b)(3)]	[X]	[ ]
6 Does the owner/operator remedy any deterioration or malfunction of equipment or structures noted during the inspection? [264.15(c)/265.15(c)]	[X]	[ ]

	YES	NO	NA
7 Does the owner/operator record inspections in an inspection log or summary which contains the date and time of inspection, name of inspector, notation of observations, and the date and nature of remedial action? [264.15(d)/265.15(d)]	[X]	[ ]	

Inspection Requirements: [X] Compliance [ ] Non-Compliance [ ] N/A

Personnel Training (DGS)

		YES	NO
8	Does the owner/operator maintain, at the facility, the following documents and records: [264.16/265.16]		
a.	Job title for each position related to hazardous waste management and the name of the employee filling each job? [264.16(d)(1)/265.16(d)(1)]	[X]	[ ]
b.	Written job description for each position? [264.16(d)(2)/265.16(d)(2)]	[X]	[ ]
c.	Written description of type and amount of training to be given each person? [264.16(d)(3)/265.16(d)(3)]	[X]	[ ]
d.	Records of training given to facility personnel? [264.16(d)(4)/265.16(d)(4)]	[X]	[ ]

Personnel Training Requirements: [X] Compliance [ ] Non-Compliance [ ] N/A

Requirements for Ignitable, Reactive, or Incompatible Wastes (DGS)

		YES	NO
9	Does the facility handle ignitable or reactive wastes? [264.17(a)/265.17(a)]	[X]	[ ]
	If yes,		
a.	Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition and radiant heat? [264.17(a)/265.17(a)]	[X]	[ ]
b.	Are smoking and open flames confined to specially designated locations? [264.17(a)/265.17(a)]	[X]	[ ]
c.	Are "No Smoking" signs posted in hazard areas? [264.17(a)/265.17(a)]	[X]	[ ]
d.	Does a check of the areas used to handle ignitable or reactive wastes show:		
	A. Evidence of heat generation from interaction of incompatible wastes? [264.17(b)(1)/265.17(b)(1)]	[ ]	[X]
	B. Evidence of uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment? [264.17(b)(2)/265.17(b)(2)]	[ ]	[X]
	C. Evidence of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? [264.17(b)(3)/265.17(b)(3)]	[ ]	[X]
	D. Evidence of any leakage from or corrosion of containers? [264.17(b)(4)/265.17(b)(4)]	[ ]	[X]

	YES	NO	NA
10 For permitted facilities only, when required to comply with paragraph (a) or (b) of 264.17/265.17, has the owner/operator documented that compliance? [264.17(c)]	[X]	[ ]	[ ]

Ignitable, Reactive, or Incompatible Waste Contingency Plan Requirements: [X] Compliance [ ] Non-Compliance [ ] N/A

Preparedness and Prevention (DPP)

	YES	NO
11 Does an inspection of the facility show any evidence of fire, explosion, or contamination? [264.31/265.31]	[ ]	[X]

	YES	NO	NA
12 If applicable to the facility, is the facility equipped with:			
a. Internal communication or alarm system easily accessible in case of emergency? [264.32(a)/265.32(a)]	[X]	[ ]	[ ]
b. Telephone or hand-held two-way radio capable of summoning emergency response assistance from local police departments, fire departments, or State or local emergency response teams? [264.32(b)/265.32(b)]	[X]	[ ]	[ ]
c. Portable fire extinguishers, fire control, spill control equipment, and decontamination equipment? [264.32(c)/265.32(c)]	[X]	[ ]	[ ]
d. Water of adequate volume for hose streams, foam producing equipment, sprinklers, etc? [264.32(d)/265.32(d)]	[X]	[ ]	[ ]
13 Is the equipment (mentioned above) tested and maintained to ensure its proper operation? [264.33/265.33]	[X]	[ ]	[ ]
14 Whenever hazardous waste is being poured, mixed, spread, or otherwise handled:			
a. Do all personnel involved in the hazardous waste activity have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee? [264.34(a)/265.34(a)]	[X]	[ ]	
b. Does an employee who is alone on the premises while the facility is operating have immediate access to a device capable of summoning external emergency assistance? [264.34(b)/265.34(b)]	[X]	[ ]	[ ]
15 Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? [264.35/265.35]	[X]	[ ]	[ ]
16 As appropriate for the type(s) of waste handled, has the owner/operator:			
a. Made arrangements with the local emergency authorities to familiarize them with the layout of the facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside the facility, and possible evacuation routes? [264.37(a)(1)/265.37(a)(1)]	[X]	[ ]	
b. Designated one primary authority in areas where more than one police and fire department might respond? [264.37(a)(2)/265.37(a)(2)]	[X]	[ ]	[ ]
c. Made agreements with state emergency response teams, emergency response contractors, and equipment suppliers? [264.37(a)(3)/265.37(a)(3)]	[X]	[ ]	[ ]
d. Familiarized local hospitals, with the properties of hazardous waste(s) handled and types of injuries that could result from fires, explosions, or releases at the facility? [264.37(a)(4)/265.37(a)(4)]	[X]	[ ]	
17 In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record? [264.37(b)/265.37(b)]	[ ]	[ ]	[X]

Preparedness and Prevention Requirements: **[X] Compliance** **[ ] Non-Compliance** **[ ] N/A**

Contingency Plan and Emergency Procedures (DCP)

18 Is a contingency plan maintained at the facility and have copies been provided to outside agencies that may be called upon to provide emergency services? [264.53(a)/265.53(a)]	[X]	[ ]	
a. If yes, does the plan:			
A. Describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? [264.52(a)/265.52(a)]	[X]	[ ]	

	YES	NO	NA
B. Describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams? [264.52(c)/265.52(c)]	[X]	[ ]	
C. List the name(s), home address(es), and phone number(s) of designated emergency coordinator(s) in the order in which they should be contacted? [264.52(d)/265.52(d)]	[X]	[ ]	
D. Include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? [264.52(e)/265.52(e)]	[X]	[ ]	
E. Include an evacuation plan for facility personnel that describes signals and evacuation routes? [264.52(f)/265.52(f)]	[X]	[ ]	
19 Is an emergency coordinator available at all times? [264.55/265.55]	[X]	[ ]	
20 Has implementation of the plan been required at the facility?	[ ]	[X]	
a. If yes, was the facility required to submit a written report on the incident to the KDHE?	[ ]	[ ]	
A. If yes, was the written report submitted? [264.56(j)/265.56(j)]	[ ]	[ ]	

Contingency Plan and Emergency Procedures Requirements: [X] Compliance [ ] Non-Compliance [ ] N/A

Manifest System, Recordkeeping, and Reporting (DMR)

21 Does the facility receive waste from off-site? [264.71/265.71]	[X]	[ ]	
a. If yes, does the owner/operator:			
A. Sign and date each copy of the manifest? [264.71(a)(1)/265.71(a)(1)]	[X]	[ ]	
B. Note any significant discrepancies in the manifest on each copy of the manifest? [264.71(a)(2)/265.71(a)(2)]	[X]	[ ]	
C. Give a signed copy to the transporter? [264.71(a)(3)/265.71(a)(3)]	[X]	[ ]	
D. Send a signed copy of the manifest to the generator within 30 days of the delivery? [264.71(a)(4)/265.71(a)(4)]	[X]	[ ]	
E. Retain a copy of the manifest for at least three years from the date of delivery? [264.71(a)(5)/265.71(a)(5)]	[X]	[ ]	
22 Does the facility receive any waste from a rail or water (bulk shipment transporter?	[ ]	[X]	
a. If yes, is the shipment accompanied by a manifest or shipping paper containing the appropriate information? [264.71(b)/265.71(b)]	[ ]	[ ]	
If yes, does the owner/operator:			
A. Does the owner/operator sign and date the shipping paper? [264.71(b)/265.71(b)]	[ ]	[ ]	
B. Note any significant discrepancies in the shipping paper? [264.71(b)(2)/265.71(b)(2)]	[ ]	[ ]	
C. Immediately give the rail or water transporter at least one copy of the shipping paper? [264.71(b)(3)/265.71(b)(3)]	[ ]	[ ]	
D. Send a signed copy of the shipping paper to the generator within 30 days of the delivery? [264.71(b)(4)/265.71(b)(4)]	[ ]	[ ]	
C. Retain a copy of the shipping paper? [264.71(b)(5)/265.71(b)(5)]	[ ]	[ ]	
23 Has the facility received any shipments of waste that were inconsistent with the manifest? [264.72/265.72]	[X]	[ ]	
a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? [264.72(b)/265.72(b)]	[X]	[ ]	

	YES	NO	NA
A. If the discrepancy was not reconciled within 15 days, did the owner/operator immediately notify the KDHE? [264.72(b)/265.72(b)]	[ ]	[ ]	X
24 Does the owner/operator keep a written operating record at the facility? [264.73(a)/265.73(a)]	[X]	[ ]	
a. If yes, does the operating record include:			
A. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? [264.73(b)(1)/265.73(b)(1)]	[X]	[ ]	
B. The location of each hazardous waste within the facility and the quantity at each location? [264.73(b)(2)/265.73(b)(2)]	[X]	[ ]	
C. Records and results of waste analyses and waste determinations? [264.73(b)(3)/265.73(b)(3)]	[X]	[ ]	
D. Reports and details of incidents requiring implementation of the contingency plan? [264.73(b)(4)/265.73(b)(4)]	[X]	[ ]	
E. Records and results of required inspections? [264.73(b)(5)/265.73(b)(5)]	[X]	[ ]	
F. Monitoring, testing, or analytical data? [264.73(b)(6)/265.73(b)(6)]	[X]	[ ]	
G. Notices to generators that the facility has the appropriate permit(s) for and will accept the waste the generator is shipping? [264.73(b)(7)/265.73(b)(7)]	[X]	[ ]	
H. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? [264.73(b)(8)/265.73(b)(8)]	[X]	[ ]	
I. Certification by the permittee, at least annually, that a hazardous waste minimization program is in place at the facility? [264.73(b)(9)/265.73(b)(9)]	[X]	[ ]	
J. As applicable, documentation that the Land Disposal Requirements have been met? [264.73(b)(10-16)/265.73(b)(10-16)]	[X]	[ ]	[ ]
25 Does the owner/operator prepare and submit a copy of a biennial report to the KDHE by March 1 of each even numbered year? [264.75/265.75]	[X]	[ ]	
a. If yes, does the report include:			
A. The EPA identification number, name, and address of the facility? [264.75(a)/265.75(a)]	[X]	[ ]	
B. The calendar year covered by the report? [264.75(b)/265.75(b)]	[X]	[ ]	
C. A description and the quantity of each hazardous waste received during the year? [264.75(d)/265.75(d)]	[X]	[ ]	
D. The method of treatment, storage, or disposal for each hazardous waste? [264.75(e)/265.75(e)]	[X]	[ ]	
E. The most recent cost estimate and, as applicable, the most recent post-closure cost estimate? [264.75(g)/265.75(g)]	[X]	[ ]	
b. If yes and the facility receives waste from off-site facilities, does the report include:			
A. The EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year? [264.75(c)/265.75(c)]	[X]	[ ]	[ ]
B. A description and the quantity, listed by the EPA identification number of each generator, of each hazardous waste received during the year? [264.75(d)/265.75(d)]	[X]	[ ]	[ ]
c. If yes and the facility receives shipments from foreign generators, does the report include the name and address of the foreign generators?	[ ]	[ ]	[X]
d. If yes and the facility is also a generator who treats, stores, and/or disposes of hazardous waste on-site, does the report include a description of:			
A. The efforts undertaken during the year to reduce the volume and toxicity of waste generated? [264.75(h)/265.75(h)]	[ ]	[ ]	[X]
B. The changes in volume and toxicity of waste actually achieved during the year in comparison to previous years? [264.75(i)/265.75(i)]		[ ]	

	YES	NO	NA
26 Has the facility accepted any waste not accompanied by a manifest or shipping papers?	[ ]	[X]	
a. If yes, was the shipment excluded from manifest/shipping paper requirements?			
A. If no, did the facility submit an unmanifested waste report to the KDHE within 15 days? [264.76/265.76]	[ ]	[ ]	

Manifest System, Recordkeeping and Reporting Requirements: **[X] Compliance** **[ ] Non-Compliance** **[ ] N/A**

Closure and Post-Closure (DCL)

27 Does the owner/operator have a written closure plan for the facility? [264.112(a)/265.112(a)]	[X]	[ ]	
a. If yes, does the plan include:			
A. A description of how and when the facility will be closed? [265.112(b)/265.112(b)]	[X]	[ ]	
B. A description of the steps necessary to completely close the facility? [264.112(b)(2)/265.112(b)(2)]	[X]	[ ]	
C. An estimate of the maximum inventory of wastes in storage or in treatment at any give time during the facility life? [264.112(b)(3)/265.112(b)(3)]	[X]	[ ]	
D. A description of the steps needed to decontaminate facility equipment at the time of closure? [264.112.(b)(4)/265.112(b)(4)]	[X]	[ ]	
E. A description of the activities necessary to ensure that all closure satisfy the closure performance standards? [265.112(b)(5)/265.112(b)(5)]	[X]	[ ]	
F. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? [264.112(b)(6)/265.112(b)(6)]	[X]	[ ]	
28 Is the facility a disposal facility?	[ ]	[X]	
a. If yes, does the owner/operator have a written post-closure plan? [264.118(a)/265.118(a)]	[ ]	[ ]	
If yes, does the plan include:			
A. Ground-water monitoring activities and frequencies at which they will be performed? [264.118(c)(1)/265.118(c)(1)]	[ ]	[ ]	
B. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment? [264.118(c)(2)/265.118(c)(2)]	[ ]	[ ]	
C. The name, address, and phone number of the person or office to contact during the post-closure period? [264.118(c)(3)/265.118(c)(3)]	[ ]	[ ]	

Closure and Post-closure Requirements: **[X] Compliance** **[ ] Non-Compliance** **[ ] N/A**

Financial Requirements (DFR)

29 Does the owner/operator have a written estimate of the closure cost? [264.142(a)/265.142(a)]	[X]	[ ]	
30 Has the owner/operator established financial assurance for facility closure and notified the KDHE? [264.143/265.143]	[X]	[ ]	

	YES	NO	NA
31 Is the facility a disposal facility?	[ ]	[X]	
a. If yes, has the owner/operator:			
A. Established a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? [264.144(a)/265.144(a)]	[ ]	[ ]	
B. Established financial assurance for post-closure care and notified the KDHE? [264.145/265.145]	[ ]	[ ]	
C. Obtained liability insurance for nonsudden and accident occurrences of at least $3 million per occurrence with an annual aggregate of at least $6 million exclusive of legal defense costs? [264.147(b)/265.147(b)]	[ ]	[ ]	
32 Has the owner/operator obtained liability insurance for sudden occurrences of at least $1 million with an aggregate of at least $2 million exclusive of legal defense costs? [264.147(a)/265.147(a)]	[X]	[ ]	

Financial Requirements: **[X] Compliance** **[ ] Non-Compliance** **[ ] N/A**

Management of Containers (DMC)

33 Are containers presently used to store hazardous waste?	[X]	[ ]	
If yes,			
a. Are the containers in good condition? [264.171/265.171]	[X]	[ ]	
b. Are the containers compatible with the waste? [264.172/265.172]	[X]	[ ]	
c. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? [264.173/265.173]	[ ]	[X]	2
d. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leaking containers and for deterioration of the containers and containment system caused by corrosion or other factors? [264.174/265.174]	[X]	[ ]	
e. Does the storage facility store waste containing free liquids which would require it to have a containment system? [264.174/265.174]	[X]	[ ]	
If yes,			
A. Is the base free of cracks or gaps and sufficiently impervious to contain leaks, spills, and accumulated precipitation? [264.175(b)(1)/265.175(b)(1)]	[X]	[ ]	
B. Is the base sloped or the containment system otherwise designed and operated to drain and removed liquids? [264.175(b)(2)/265.175(b)(2)]	[X]	[ ]	
C. Does the containment system have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater? [264.175(b)(3)/265.175(b)(3)]	[X]	[ ]	
D. Is the containment system designed to prevent run-on or to have sufficient excess capacity in addition to that required in item C above? [264.175(b)(4)/265.175(b)(4)]	[X]	[ ]	
E. Are spilled or leaked waste and accumulated precipitation removed in a timely manner as necessary to prevent overflow of the system? [264.175(b)(5)/265.175(b)(5)]	[X]	[ ]	
f. Does the storage area store containers holding only wastes that do not contain free liquids?	[ ]	[X]	
If yes,			
A. Are the containment system requirements of 264.175(b)/265.175(b) met?	[ ]	[ ]	
If no,			
i. Is the storage area sloped or otherwise designed and operated to drain and remove liquid resulting from precipitation? [264.175(c)(1)/265.175(c)(1)]; OR	[X]	[ ]	
ii. Are the containers elevated or otherwise protected from contact with accumulated liquid? [264.175(c)(2)/265.175(c)(2)]	[X]	[ ]	

		YES	NO	NA
g.	Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? [264.176/265.176]	[X]	[ ]	
h.	If waste in containers is incompatible with other materials stored nearby, in other containers, piles. open tanks, or surface impoundments, are the containers separated from other materials by means of a dike, berm, wall, or other device? [264.177(c)/265.177(c)]	[X]	[ ]	

Management of Containers [ ] Compliance [X] Non-Compliance [ ] N/A

TSDLIST: TSD Checklist Revised 9/98

Additional Information and Conclusions:

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT
1000 SW Jackson, Suite 320
Topeka, Kansas 66612-1366

TANK INSPECTION CHECKLIST
for
EPA and KANSAS GENERATORS

General Tank Information

__X_ EPA Generator ____ Kansas Generator

Tank Number or Name:	V-1	V-2 through V-8, V17 & V-26 (9 tanks)	V-9 through V-16 (11 tanks)
Capacity: (gallons)	7,363	522 to 20,895	2,659 to 9,028
Substance Stored:	10-8-02 to 1-31-03 waste oil; currently not in use	none Empty since fall 1999	none Empty since fall 1999
Waste Code:	D008	n/a	n/a
Location:	Processing Area	Processing Area	Building D
Type: steel, fiberglass, etc.	steel	steel	steel
Vertical or horizontal:	vertical	vertical	horizontal
Type of tank roof:	closed	closed	closed

Applicability — 40 CFR 265.190

1. The following tank systems are exempt from 40 CFR 265 Subpart J:
   - (a) Tank systems that are an integral component of a recycling unit.
   - (b) Tank systems that meet the definition of a totally enclosed treatment unit.
   - (c) Tank systems that meet the definition of an elementary neutralization unit.
   - (d) Tank systems that are used **exclusively** for hazardous waste water treatment under the Clean Water Act.
   - (e) Tank systems that store or treat hazardous waste that contain no free liquids and are located inside a building with an impervious floor are exempt from secondary containment requirements only.
   - (f) Tank systems, including sumps, that serve as part of a secondary containment system.

(For Kansas Generator, begin on page 8, Question 31)

Existing Tank Systems Requirements - EPA Generator 40 CFR 265.191

			YES	NO
2.	(a)	Is the tank system an existing system, i.e., used for the management of hazardous waste prior to July 14, 1986? If no, skip to 2c.	[ ]	[X]
	(b)	Does the tank system have secondary containment? If yes, skip to Question 13 and evaluate containment. If no, skip to 2h.	[ ]	[ ] n/a
	(c)	Did the generator's waste become a hazardous waste after July 14, 1986?	[ ]	X
	(d)	Is the tank system required to have secondary containment under 40 CFR 265.193(a)(5)? If no, skip to 2f.	[X]	[ ]
	(e)	Does the tank system have secondary containment? If yes, skip to Question 3 and evaluate containment as a new tank component. If no, skip to 2i.	[X]	[ ]
	(f)	Did the generator obtain and keep on file at the facility a written assessment reviewed and certified by an independent, qualified, registered professional engineer in accordance with 40 CFR 270.11(d), that attests to the tanks system's integrity within 12 months after the date the waste became a hazardous waste? **40 CFR 265.191(a)** If no, skip to 2i.	[ ]	[ ] n/a
		(A) At a minimum, did the assessment consider the following: **40 CFR 265.191(b)**		
		(i) Design standards of the tank and ancillary equipment?	[ ]	[ ]
		(ii) Hazardous characteristics of the waste?	[ ]	[ ]
		(iii) Existing corrosion protection?	[ ]	[ ]
		(iv) Documented age of the tank system, if available ?	[ ]	[ ]
		(v) Results of a leak test, internal inspection, or other tanks integrity examination per 40 CFR 265.191(b)(i) or (ii)?	[ ]	[ ]
	(g)	If the assessment found the tank was leaking or unfit for use, did the generator comply with 40 CFR 265.196? **40 CFR 265.191(d)** If yes, skip to Question 13. If no, skip to 2i.	[ ]	[ ] n/a
	(h)	Does the generator have a variance? If yes, review variance and skip to Question 15.	[ ]	[ ] n/a
	(i)	The tank system must be emptied and taken out-of-service until secondary containment or a variance is provided. **K.S.A. 65-3441(a)(4)** **STOP**		

Existing Tank System	[X] Compliance	[ ] Non-Compliance	[ ] NA

New Tank System Requirements - EPA Generator	40 CFR 265.192

	YES	NO
Generators using new tank systems or adding new components must ensure that the foundations, structural supports, seams, connections, and pressure controls (if applicable) are adequately designed and that the tank system has sufficient structural strength, compatibility with the waste to be stored or treated, and corrosion protection so that the it will not collapse, rupture, or fail.		
3. Has the generator obtained a written assessment reviewed by an independent, qualified, registered professional engineer, who certified in accordance with 40 CFR 270.11(d), attesting to the systems design? **40 CFR 265.192(a)**	[X]	[ ]
4. Did the assessment include, at a minimum, the following information: **40 CFR 265.192(a)**		
(a) Design standards for each tank and its ancillary equipment?	[X]	[ ]
(b) Hazardous characteristics of the waste to be handled?	[X]	[ ]
(c) For an external metal tank shell or metal tank components that will contact soil or water, a determination by a corrosion expert of:		
A. Corrosion factors:		
(i) Soil moisture?	[ ]	[ ]N/A
(ii) Soil pH?	[ ]	[ ]N/A
(iii) Soil sulfide level?	[ ]	[ ]N/A
(iv) Soil resistivity?	[ ]	[ ]N/A
(v) Structure to soil potential?	[ ]	[ ]N/A
(vi) Influence of nearby underground metal structures?	[ ]	[ ]N/A
(vii) Stray electrical currents?	[ ]	[ ]N/A
(viii) Existing corrosion protection measures?	[ ]	[ ]N/A
B. The type and degree of external corrosion protection needed to ensure the integrity of the tank system, by means of one of the following:		
(i) Corrosion resistant materials, e.g. special alloys or FRP?	[ ]	[ ]N/A
(ii) Corrosion resistant coatings with cathodic protection?	[ ]	[ ]N/A
(iii) Electrical isolation devices?	[ ]	[ ]N/A
(d) For UST's components likely to be affected by vehicular traffic, is there a determination of design or operational measures that will protect the tank system from damage?	[ ]	[ ]N/A
(e) Design considerations to ensure any of the following:		
A. Does the tank foundation support the load of a full tank?	[X]	[ ]
B. Does the tank system need to be anchored if placed in a saturated zone or seismic fault zone?	[ ]	[ ] N/A
C. Will the tank system withstand effects of frost heave?	[ ]	[ ] N/A
5. The generator must ensure that proper handling procedures were used to install the tank system and prior to covering, enclosing, or placing a new tank system or component in use, an independent, qualified installation inspector or an independent, qualified, registered professional engineer, either of whom is trained and experienced in proper installation of tank systems or components, must inspect		

the system for the presence of: **40 CFR 265.192(b)**

(a) Weld breaks?	[X]	[ ]
(b) Punctures?	[X]	[ ]
(c) Scrapes of protective coatings?	[X]	[ ]
(d) Cracks?	[X]	[ ]
(e) Corrosion?	[X]	[ ]
(f) Other structural damage or inadequate construction or installation?	[X]	[ ]

6. If problems were found, were they repaired before the tank was covered, enclosed, or placed in use? **40 CFR 265.192(b)** [ ] [ ] N/A

7. For UST's, was the system backfilled with noncorrosive, porous, homogeneous material and installed so that the tank and piping were fully and uniformly supported? **40 CFR 265.192(c)** [ ] [ ] N/A

8. Were the tanks and ancillary equipment tested for tightness prior to being covered, enclosed, or placed in use? **40 CFR 265.192(d)** [X] [ ]

9. If problems were found, were repairs made prior to being covered, enclosed, or placed in use? **40 CFR 265.192(d)** [ ] [ ] N/A

10. Is all ancillary equipment supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction? **40 CFR 265.192(e)** [X] [ ]

11. Did the generator provide the type and degree of corrosion protection specified in the design plans? **40 CFR 265.192(f)** [ ] [ ] N/A
    (a) If yes, was the installation of the corrosion protection system supervised by an independent corrosion expert? [ ] [ ]

12. Did the generator obtain and maintain on file at the facility written statements by those persons required to certify the design of the tank system and supervise the installation of the tank system in accordance with the design plans? **40 CFR 265.192(g)** [X] [ ]
    (a) If yes, do the written statements include the certification statement as required in 40 CFR 270.11(d)? [X] [ ]

New Tank System Requirements **[X] Compliance** **[ ] Non-Compliance** **[ ] NA**

Containment and Detection Requirements - EPA Generator **40 CFR 265.193**

		YES	NO
13.	If the tank is required to have secondary containment, does it meet the following minimum requirements: **40 CFR 265.193(b) and (c)**		
(a).	Constructed of or lined with materials compatible with the waste and of sufficient strength?	[X]	[ ]
(b)	Placed on a structurally adequate foundation or base?	[X]	[ ]
(c)	Provided with a leak detection system capable of detecting releases within 24 hours?	[X]	[ ]
(d)	Adequately sloped or designed or operated to drain and remove liquids from leaks, spills or precipitation within 24 hours?	[X]	[ ]

(e) Does the secondary containment include one of the following: **40 CFR 265.193(d)**

A.	External liner?	[X]	[ ]
B.	Vault?	[ ]	[ ]
C.	Double-walled tank?	[ ]	[ ]
D.	Equivalent device approved by the Secretary?	[ ]	[ ]

(f) Does the secondary containment satisfy the following requirements: **40 CFR 265.193(e)**

For External Liner

A.	Adequate capacity to contain 100% of the volume of the largest tank within its boundary?	[X]	[ ]
B.	Designed or operated to prevent run-on or infiltration of precipitation into the containment system unless it has excess capacity to contain a 25-year, 24-hour rain event?	[X]	[ ]
C.	Free of cracks or gaps?	[X]	[ ]
D.	Completely surrounds the tank and surrounding earth likely to be exposed to waste if a release occurs?	[X]	[ ]

For External Liner Constructed of Concrete

E.	Constructed with chemical-resistant water stops at all joints?	[X]	[ ]
F.	Provided with an impermeable coating or lining over the concrete?	[X]	[ ]

For Vaults

G.	Adequate capacity to contain 100% of the volume of the largest tank within its boundary?	[ ]	[ ]
H.	Designed or operated to prevent run-on or infiltration of precipitation into the containment system unless it has excess capacity to contain a 25-year, 24-hour rain event?	[ ]	[ ]
I.	Constructed with chemical-resistant water stops at all joints?	[ ]	[ ]
J.	Provided with an impermeable coating or lining over the concrete?	[ ]	[ ]
K.	Protected against vapor ignition, if required due to ignitable or reactive characteristics?	[ ]	[ ]
L.	Provided with an exterior moisture barrier or designed and operated to prevent migration of moisture into the vault?	[ ]	[ ]

For Double-Walled Tanks

M.	Designed as an integral structure so that outer tank contains any release from inner tank?	[ ]	[ ]
N.	If metal, the interior of the primary tank and external surface of the outer shell is it protected from corrosion?	[ ]	[ ]
O.	Provided with a built-in continuous leak detection system capable of detecting releases within 24 hours?	[ ]	[ ]

14. Is ancillary equipment provided with adequate secondary containment, except aboveground piping (exclusive of flanges, valves, and connections), welded flanges, welded joints, welded connections, sealless or magnetic coupling pumps,

sealless valves, pressurized aboveground piping with an automatic shut-off device, any of which when present, are visually inspected daily for leaks? **40 CFR 265.193(f)** [X] [ ]

Containment and Detection Requirements [X] Compliance [ ] Non-Compliance [ ] NA

Operating Requirements - EPA Generator **40 CFR 265.194**

		YES	NO
15.	Is each tank marked with the accumulation start date? **K.A.R. 28-31-4(g)(2)**	[]	[ ]
	(a) Is each tank emptied at least every 90 days? **K.S.A. 65-3441(a)(4)**	[]	[ ]
16.	Is each tank labeled with the words "Hazardous Waste?" **K.A.R. 28-31-4(g)(3)**	[]	[ ]
17.	Are hazardous wastes or treatment reagents placed in the tank system that could cause the tank, the ancillary equipment or secondary containment to rupture, leak, corrode, or otherwise fail? **40 CFR 265.194(a)**	[ ]	[]
18.	Does the generator use, at a minimum, the following appropriate controls and practices to prevent spills and overflows: **40 CFR 265.194(b)**		
	(a) Spill prevention controls (e.g.,check valve, dry disconnects, etc.)	[]	[ ]
	(b) Overfill prevention controls (e.g., high level senors or alarms, automatic feed cutoff, bypass to standby tank).	[]	[ ]
	(c) Maintenance of freeboard in uncovered tank to prevent overtopping by wave or wind action or precipitation.	[ ]	[ ]

Operating Requirements [ ] Compliance [ ] Non-Compliance [X] NA

Inspection Requirements - EPA Generator **40 CFR 265.195**

		YES	NO
19.	Does the generator inspect, where present, at least once each operating day the following items: **40 CFR 265.195(a)**		
	(a) Overfill/spill control equipment (waste-feed cutoff or bypass system) to ensure proper working order?	[X]	[ ]
	(b) Above-ground portions of the tanks system to detect corrosion or releases?	[X]	[ ]
	(c) Data from monitoring and leak detection equipment to ensure proper operation?	[X]	[ ]
	(d) Areas around tank and the secondary containment to detect leaks, etc?	[X]	[ ]
20.	If the tank has cathodic protection systems, it must be inspected according to the following schedule: **40 CFR 265.195(b)**	N/A	
	(a) Was proper operation confirmed within 6 months of installation and annually thereafter?	[ ]	[ ]
	(b) Are impressed current sources inspected/tested at least bimonthly?	[ ]	[ ]
	(c) Are records maintained of these inspections?	[ ]	[ ]

21. Are all daily inspections documented and kept on file for three years? **K.A.R. 28-31-4(k)** [ ] [X] **11**

Inspection Requirements	**[ ] Compliance**	**[X] Non-Compliance**	**[ ] NA**

Response to Leaks or Spills - EPA Generator 40 CFR 265.196

		YES	NO
22.	If the tank system or secondary containment system had a leak or spill or was determined to be unfit for use, was it immediately removed from service? **40 CFR 265.196**	[ ]	[ ]
	(a) If yes, was appropriate follow-up actions taken as required by 40 CFR 265.196(a) through (e), including notifying KDHE of the release within 24 hours?	[ ]	[ ]
23.	If extensive repair has been conducted on the tank system, was it recertified by an independent, qualified, registered professional engineer in accordance with 40 CFR 270.11(d) and such certification submitted to the KDHE within 7 days after the tank system was returned to service? **40 CFR 265.196(f)**	[ ]	[ ]

Response to Leaks or Spills	**[ ] Compliance**	**[ ] Non-Compliance**	**[X] NA**

Closure Requirements - EPA Generator 40 CFR 265.197

		YES	NO
24.	If the tank system or part of the tank system has been closed, did the generator remove or decontaminate all waste residues, contaminated containment components, contaminated soils, and contaminated structures and equipment and manage them as hazardous waste? **40 CFR 265.197(a)**	[ ]	[ ]
25.	If all contaminated soils cannot be practically removed or decontaminated, does the generator provide post-closure care under the landfill requirements of 40 CFR 265.310? **40 CFR 265.197(b)**	[ ]	[ ]

Closure Requirements	**[ ] Compliance**	**[ ] Non-Compliance**	**[X] NA**

Special Requirements for Ignitable and Reactive Waste - EPA Generator 40 CFR 265.198

		YES	NO
26.	With the exception of emergency situations, have ignitable or reactive wastes been placed in any tank by the generator? **40 CFR 265.198**	[ ]	[X]
	(a) If yes, did the generator insure the safety of the operation by one or both of the following methods: **40 CFR 265.198(a)**		
	A. Was the waste treated immediately before or after being placed in the tank so that it is no longer ignitable or reactive and such treatment is done in compliance with the safety requirements of 40 CFR 265.17(b)?	[ ]	[ ]

B. Was the waste stored or treated under protected conditions eliminating the possibility of ignition or reaction? [ ] [ ]

27. If a tank is used to treat or store ignitable or reactive wastes, does the generator meet the National Fire Protection Association's buffer zone requirements for flammable and combustible liquids? **40 CFR 265.198(b)** [ ] [ ]

Ignitable and Reactive Waste	**[ ] Compliance**	**[ ] Non-Compliance**	**[X] NA**

Special Requirements for Incompatible Waste - EPA Generator 40 CFR 265.199

	YES	**NO**
28. If incompatible wastes or incompatible waste and materials are placed in the same tank, is this done under completely controlled and safe conditions as specified in 40 CFR 265.17(b)? **40 CFR 265.199(a)**	[ ]	[ ]
29. If hazardous waste is placed in a contaminated tank that previously held incompatible waste or materials, did the generator comply with 265.17(b)? **40 CFR 265.199(b)**	[ ]	[ ]

Incompatible Waste	**[ ] Compliance**	**[ ] Non-Compliance**	**[X] NA**

Air Emissions Requirements - EPA Generator 40 CFR 265.202

	YES	**NO**
30. Any tank system operated by an EPA generator must comply with applicable sections of Subpart AA , BB, and CC. Is the generator subject to:		
(a) 40 CFR 265 Subpart AA?	[ ]	[ ]
(b) 40 CFR 265 Subpart BB?	[ ]	[ ]
(c) 40 CFR 265 Subpart CC?	[ ]	[ ]
If yes to any, complete the appropriate checklists.		

Air Emission Requirements	**[ ] Applicable**	**[X] Not Applicable**

(EPA Generator Stop Here)

HAZARDOUS WASTE TRANSPORTER
COMPLIANCE INSPECTION CHECKLIST

Transporter Requirements (TRR)

		YES	No	N/A
1.	Are they registered as a hazardous waste transporter with KDHE? **KAR 28-31-6 (b)**	☒	☐	☐
2.	Does transporter comply with the manifest requirements of 40 CFR Part 263.20 except 263.20(h)? **KAR 28-31-6(a)**	☒	☐	☐
3.	Does transporter retain a copy of the manifest for three years? **KAR 28-31-6(a)**	☒	☐	☐
4.	If they transport hazardous waste subject to the manifest exemption of KAR 28-31-4(d)(7), does the transporter record the following on a log or shipping paper:	☐	☐	☒
a.	The name, address, and EPA ID Number of the generator; **KAR 28-31-6(e)(2)(A)**			
b.	Quantity of waste shipped? **KAR 28-31-6(e)(2)(B)**	☐	☐	☒
c.	DOT shipping information? **KAR 28-31-6(e)(2)(C)**	☐	☐	☒
d	Date the waste was accepted? **KAR 28-31-6(e)(2)(D)**	☐	☐	☒
e	Does the transporter carry this record when transporting the waste to the reclamation facility? **KAR 28-31-6(e)(3)**	☐	☐	☒
f	Does the transporter retain this record for a period of three years after termination or expiration of the agreement? **KAR 28-31-6(e)(4)**	☐	☐	☒

Transporter Requirements: ☒ **Compliance** ☐ **Non-Compliance** ☐ **NA**

Additional Information and Conclusions:

Other items:

RCRA Compliance Evaluation Inspection Summary

Clean Harbors Kansas, LLC
2549 N. New York
Wichita, Kansas 67219

EPA ID No.: KSD 007 246 846

Inspection Date: August 10 and 11, 2005

KDHE INSPECTOR: Debbie Travis, SCDO

1.0 INTRODUCTION:

On the above dates a routine inspection was conducted at Clean Harbors Kansas, LLC to determine compliance with state hazardous waste regulations and T/S/D status. The inspection covered points of waste generation, waste storage areas, and included a review of related documents and records. I arrived at the facility at approximately 9:00 a.m. and met with Brian Key, Manager of Clean Harbors Field Service Division.

The permit for this facility expired April 7, 2005. However, since the Kansas Department of Health and Environment (KDHE) received a renewal application dated October 8, 2004, the permit and all permit conditions remain in effect until a new permit is issued. Shawn Howell, P.E. is the contact person with the Bureau of Waste Management (BWM), Hazardous Waste Permit Section.

2.0 CHANGES SINCE PREVIOUS INSPECTION:

All of the employees at the site are under the Clean Harbors Field Services Division. There is no division between site personnel and field services personnel. Mr. Key informed me that currently the facility is primarily a 10-day transfer facility (truck to truck). The only waste that might be stored over ten days could be waste generated on site and D001 waste stored in a tanker.

This facility was last inspected as both a T/S/D and an EPA Generator of Hazardous Waste in September 2003. Twelve violations were cited and corrected: failure to determine if the liquid or the materials are hazardous, failure to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste constituents to the air, soil, or surface water which could threaten human health or the environment, failure to document the required information on 45 inspection logs, failure to provide hazardous waste training, failure to provide copies of the Contingency Plan to outside agencies, failure to update the emergency coordinator documented in the Contingency Plan, failure to have a trained emergency coordinator available at all times in case of an emergency, failure to comply with the following manifest requirements, failure to manage incompatible wastes in accordance with the procedures in Special Requirements for Incompatible Wastes, failure

to properly handle a hazardous waste storage container that is not in good condition, failure to inspect tank V-1 on 11/2/02 and 11/3/02, and failure to maintain the roof of building D and adequate TSD staffing.

The previous inspection of this facility (Safety Kleen) was in June 2002. Nine violations were cited and corrected: two open satellite drums, one unlabeled satellite drum, one storage drum not in good condition, two storage containers with no accumulation start date, two drums with improper accumulation start dates, failure to maintain the roof on buildings (B, J, I, & D), 138 violations on the daily and weekly inspection logs, failure to provide 61 daily inspection logs, and failure to file a notice with the Secretary of KDHE for exporting hazardous waste to a foreign source five times. A Consent Agreement and Final Order was signed on March 11, 2005.

3.0 INSPECTION:

Mr. Key accompanied me on the inspection of the facility. Refer to attachment 1 for the facility site map. The facility consist of buildings A, B, C, D, E, H, I, J, K, processing area, and drum dock area. Many of the buildings are empty, but they all contained the required safety equipment.

Building A

This building is currently storing office equipment.

Building B

This building is currently empty. The building is permitted to store corrosive and non-ignitable hazardous waste.

Building C

The building is permitted to store ignitable and non-ignitable hazardous waste. This building is currently storing, empty drums, packing material, and one drum of hazardous waste. Within the hazardous waste storage area I observed the black 55-gallon hazardous waste storage drum (photographs 1 and 2). The drum was labeled with the words "hazardous waste" but was not labeled with an accumulation start date. The drum contained approximately 40 gallons of B52 hazardous lean waters. The drum was labeled with profile number T05324. Refer to attachment two for the Waste Material Profile Sheet No. T05324. I asked Mr. Key if they manage this drum as a storage container. He told me they consider this drum a storage container. I then ask him how the waste is generated. He explained that some of the buildings have a blind sump. The blind sumps were designed to capture and collect any free liquids within each building. Currently, periodically rainwater collects in those blind sumps. Mr. Key told me they still handle the liquid as hazardous because they don't know what might have been on the floor or in the blind sump previously. This drum is transported throughout the facility and the liquid waste from the blind sumps are pumped into the drum. **Violation 1** K.A.R. 28-31-4(g)(2) was cited for failure to mark or label a storage drum with an accumulation start date. Violation 1 was corrected during the inspection. Mr. Key dated the storage drum 8/3/05 (photograph 3).

Building D

This building is currently storing empty drums and maintenance equipment. The building is permitted to store ignitable and/or non-ignitable or a combination of both materials. Additionally, there are eleven horizontal tanks mounted from the ceiling. The tanks have been cut open and are not currently in use.

Building E

This building houses the administrative offices for the facility.

Building H

This building houses the laboratory, which is not used anymore.

Building I

This building is currently empty. The building is permitted to store ignitable, non-ignitable, reactive, non-reactive and other hazardous waste.

Building J

The building is permitted to store ignitable, non-ignitable, reactive, non-reactive, and other hazardous waste. Sitting up on a catwalk (platform) I observed two white 5-gallon containers (photographs 4 through 6). Mr. Key climbed up the ladder. The container labeled "base" was empty. The container labeled "acid" contained approximately 2 to 3 gallons of liquid. I observed hoses protruding from a hole in the lid of the container. Mr. Key told me these hoses are connected to the vapor scrubber unit. The purpose of these containers is to capture any backflow from the vapor scrubber unit. However, the vapor scrubber unit has not been operated since 2002. During our lunch break Mr. Key tested the liquid. The result indicated the liquid was acidic. Additionally, he told me they had drained the unit completely in January 2005 because they have no intention of operating the unit. The facility disposed of 425 P of waste sulfuric acid under manifest #00575 (attachment three). Mr. Key told me this waste came from the vapor scrubber unit. The date on manifest #00575 is 1/13/05 which indicates the waste liquid stored in the 5-gallon container had been there for more than ninety-days. The 5-gallon storage container labeled "acid" is considered open because of the hole in the lid. Additionally, the container was not labeled with the words "hazardous waste" and not labeled with an accumulation start date. **Violation 2**, Permit Part I, Section III. E. [40CFR264, subpart I) was cited for failure to manage a storage container properly. Refer to the Permit Part I, Section III.E. - *Management of Containers* (attachment four). Refer to the RCRA Permit Application, Section D-*Use and Management of Containers*. Mr. Key transported the closed and labeled the 5-gallon white storage container to the hazardous waste storage area located in Building C (photographs 7 and 8).

Building K

This building is currently storing office equipment. The building is a non-permitted building.

Processing Area

The processing area is currently not in operation. Within the processing area there are ten storage tanks.

Drum Dock Area

The 10-day storage drums are managed in this area. A metal awning attached to Building (C) covers the area. I observed one labeled and closed satellite drum containing solid hazardous waste (D001, D018, D035, F003, F005).

4.0 Record Review:

I reviewed the biennial report, contingency plan, personnel training documents, manifests, LDR's, and inspection logs from September 10, 2003 through August 10, 2005. Clean Harbors has a computer generated bar code and numbering system. Every container is labeled with a bar code for tracking.

5.0 Exit Briefing:

On August 11, 2005, I returned to Clean Harbors to conduct the exit briefing with Mr. Key. Lon Stewart, Regulator Compliance Manager attended the exit meeting via telephone. I explained the violations and the corrective actions. During our discussions concerning the violations Mr. Stewart expressed his disagreement with the violations: *Violation 1*, Mr. Stewart told me that the drum is considered a satellite container. I told him Mr. Key had informed me the drum is a storage drum and he had already marked the drum with an accumulation start date. Mr. Key then told me he had given me incorrect information about the drum. I then informed them that the drum did not meet the definition of a satellite container because it is not near the point of generation. I recommended that they place a satellite container next to the blind sumps located in each building.
Violation 2, Mr. Stewart told me that he considered these containers as part of the process because the containers were attached to the vapor scrubber unit. I informed Mr. Stewart that Mr. Key had told me the operation of the vapor scrubber unit had ceased in 2002 and as of January 2005 the unit had been completing drained.

Additionally, we discussed the following concerns and comments:
A. Manifest: Initial all changes on the manifest.
B. Laboratory: Cleanout materials inside the fume hood.

I left the following documents with Mr. Key:

- Notice of Non-Compliance
- Hazardous Waste Generator Handbook

6.0 ATTACHMENTS:

1. Facility Site Map
2. Waste Material Profile Sheet No. T05324 (4 pages)
3. Manifest # 00575
4. Permit Part I, Section III.E. Management of Containers

4. RCRA Permit Application Section D-Use and Management of Containers (2 pages)

7.0 APPENDIX:

Debbie Travis took all photographs with a Sony Mavica digital camera

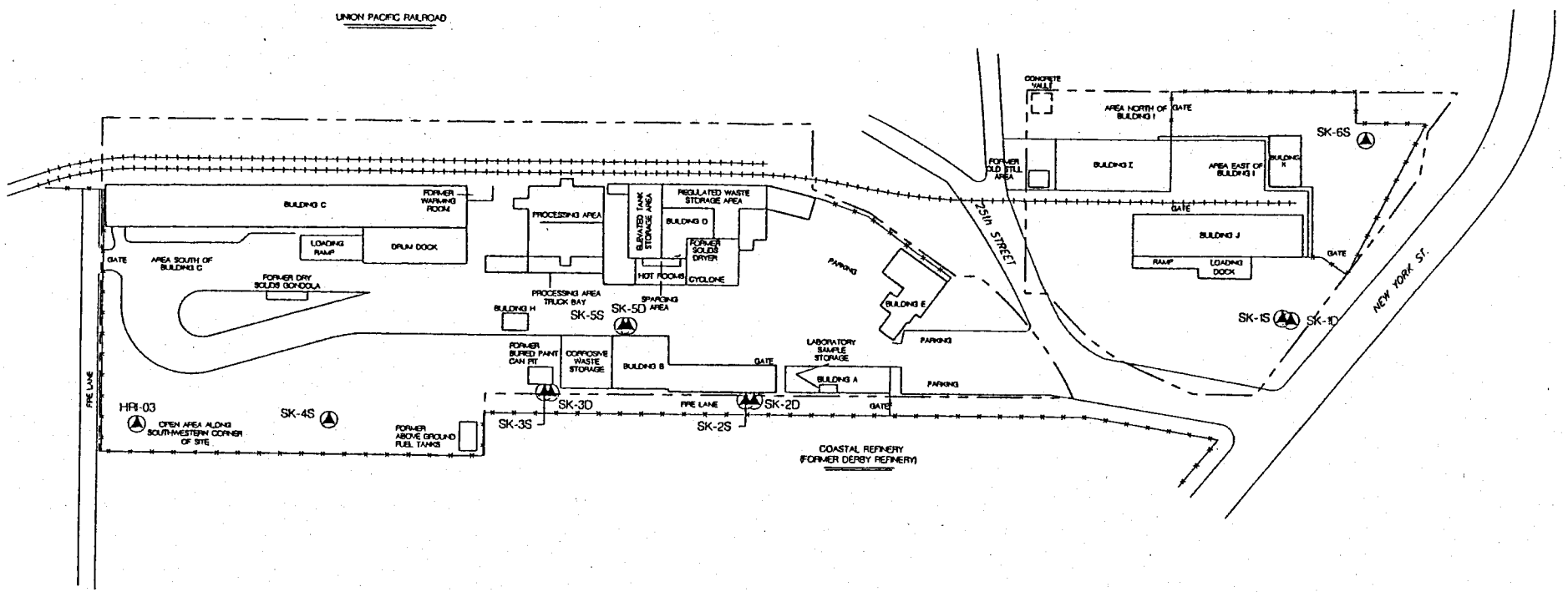
8.0 SIGNATURE OF AUTHOR/INSPECTOR:

Debbie Travis prepared this report:

Debbie Travis 9/27/05

Signature Date

ATTACHMENTS



LEGEND

- : SWMU Locations
- : AOC Locations
- MONITORING WELL LOCATIONS

NOTE: SURVEYED TO STATE PLANE COORDINATE SYSTEM

BY	DATE
DRAWN C.U	7-02-01
CHECKED	
APPROVED	
APPROVED	
APPROVED	

CAMERON-COLE

SAFETY-KLEEN - (WICHITA) FACILITY

FIGURE 2
SITE MAP

SCALE: 1" = 100'

DWG NO: 963231-0042

ATTACHMENT 1 Page 1 of 1

WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No. T05324

A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION # *MAD039322250*
GENERATOR CODE (Assigned by Clean Harbors) *CO*
ADDRESS *1501 Washington Street*

GENERATOR PROFILE No. **T05324**
GENERATOR NAME: *Clean Harbors Env Services Inc*
CITY *Braintree* STATE/PROVINCE *MA* ZIP/POSTAL CODE *02184*
PHONE:

CUSTOMER CODE (Assigned by Clean Harbors) *CO*
ADDRESS *1501 Washington Street*

CUSTOMER NAME: *Clean Harbors Env Services Inc*
CITY *Braintree* STATE/PROVINCE *MA* ZIP/POSTAL CODE *02184*

B. WASTE DESCRIPTION

WASTE DESCRIPTION: *B52 HAZ LEAN WATERS*

PROCESS GENERATING WASTE (Please provide detailed description of process generating waste):
TSDF CONSOLIDATION

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE
- SOLID WITHOUT FREE LIQUID
- POWDER
- MONOLITHIC SOLID
- ☑ LIQUID WITH NO SOLIDS
- LIQUID/SOLID MIXTURE
  - % FREE LIQUID
  - % SETTLED SOLID
  - % TOTAL SUSPENDED SOLID
- SLUDGE
- GAS/AEROSOL

NUMBER OF PHASES/LAYERS
☑ 1 2 3
% BY VOLUME (Approx.)
TOP
MIDDLE
BOTTOM *0.00*

VISCOSITY (If liquid present)
- ☑ 1 - 100 (e.g. WATER)
- 101 - 500 (e.g. MOTOR OIL)
- 501 - 10,000 (e.g. MOLASSES)
- > 10,000

COLOR
CLEAR TO MUDDY

ODOR
- NONE
- ☑ MILD
- STRONG

Describe:

BOILING POINT °F (°C)
- <= 95 (<=35)
- 95 - 100 (35-38)
- 101 - 129 (38-54)
- ☑ >= 130 (>54)

MELTING POINT °F (°C)
- < 140 (<60)
- 140-200 (60-93)
- > 200 (>93)

TOTAL ORGANIC CARBON
- ☑ <= 1%
- 1-9%
- >= 10%

FLASH POINT °F (°C)
- < 73 (<23)
- 73 - 100 (23-38)
- ☑ 101 -140 (38-60)
- 141 -200 (60-93)
- > 200 (>93)

Actual:

pH
- <= 2
- 2.1 - 6.9
- ☑ 7 (Neutral)
- 7.1 - 12.4
- >= 12.5

Actual:

SPECIFIC GRAVITY
- < 0.8 (e.g. Gasoline)
- 0.8-1.0 (e.g. Ethanol)
- ☑ 1.0 (e.g. Water)
- 1.0-1.2 (e.g. Antifreeze
- > 1.2 (e.g. Methylene Chloride)

ASH
- < 0.1
- 0.1 - 1.0
- 1.1 - 5.0
- 5.1 - 20.0
- > 20
- ☑ Unknown

Actual:

BTU/LB (MJ/kg)
- ☑ < 2,000 (<4.6)
- 2,000-5,000 (4.6-11.6)
- 5,000-10,000 (11.6-23.2)
- > 10,000 (>23.2)

Actual:

VAPOR PRESSURE (for liquids only) mm Hg

D. COMPOSITION (List the complete composition of the waste, include any inert components and /or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN -- MAX	UOM
CHLORINATED SOLVENTS	*1.000 -- 10.000*	%
FLAMMABLE SOLVENTS	*1.000 -- 10.000*	%
KEROSENE		Trace
METALS		Trace
WATER	*90.000 -- 99.000*	%

CHEMICAL	MIN -- MAX	UOM

ATTACHMENT 2 Page 1 of 4

ANY METAL OBJECTs PRESENT? YES ☑ NO
If yes include dimension:

E. CONSTITUENTS -- Are these values based on testing or knowledge? ☑ Knowledge ☐ Testing

If constituent concentrations are base on analytical testing, analysis must be provided. If based on knowledge, basis of knowledge must be provided below.

.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D004	ARSENIC	5.0		
D005	BARIUM	100.0		
D006	CADMIUM	1.0		
D007	CHROMIUM	5.0		
D008	LEAD	5.0		
D009	MERCURY	0.2		
D010	SELENIUM	1.0		
D011	SILVER	5.0		

RCRA	VOLATILE COMPOUNDS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D018	BENZENE	0.5		
D019	CARBON TETRACHLORIDE	0.5		
D021	CHLOROBENZENE	100.0		
D022	CHLOROFORM	6.0		
D028	1,2-DICHLOROETHANE	0.5		
D029	1,1-DICHLOROETHYLENE	0.7		
D035	METHYL ETHYL KETONE	200.0		
D039	TETRACHLOROETHYLENE	0.7		
D040	TRICHLOROETHYLENE	0.5		
D043	VINYL CHLORIDE	0.2		

RCRA	SEMI-VOLATILE COMPOUND	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D023	o-CRESOL	200.0		
D024	m-CRESOL	200.0		
D025	p-CRESOL	200.0		
D026	CRESOL (TOTAL)	200.0		
D027	1,4-DICHLOROBENZENE	7.5		
D030	2,4-DINITROTOLUENE	0.13		
D032	HEXACHLOROBENZENE	0.13		
D033	HEXACHLOROBUTADIENE	0.5		
D034	HEXACHLOROETHANE	3.0		
D036	NITROBENZENE	2.0		
D037	PENTACHLOROPHENOL	100.0		
D038	PYRIDINE	5.0		
D041	2,4,5-TRICHLOROPHENOL	400.0		
D042	2,4,6-TRICHLOROPHENOL	2.0		

RCRA	PESTICIDES AND HERBICIDE	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D012	ENDRIN	0.02		
D013	LINDANE	0.4		
D014	METHOXYCHLOR	10.0		
D015	TOXAPHENE	0.5		
D016	2,4-D	10.0		
D017	2,4,5-TP (SILVEX)	1.0		
D020	CHLORDANE	0.03		
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008		

OTHER METALS	MIN	MAX	UOM
ALUMINUM			
ANTIMONY			
BERYLLIUM			
CALCIUM			
COPPER			
MAGNESIUM			
MOLYBDENUM			
NICKEL			
POTASSIUM			
SILICON			
SODIUM			
THALLIUM			
TIN			
VANADIUM			
ZINC			

NON-METALS	MIN	MAX	UOM
BROMINE			
CHLORINE			
FLUORINE			
IODINE			
SULFUR			

OTHER NON-METALS	MIN	MAX	UOM
AMMONIA			
REACTIVE SULFIDE			
CYANIDE-TOTAL			
CYANIDE AMENABLE			
CYANIDE REACTIVE			

OTHER CHEMICALS	MIN	MAX	UOM
PHENOL			
Total Petroleum Hydrocarbons			

OTHER

HOCs

☑ NONE
< 1000 PPM
>= 1000 PPM

PCBs

☑ NONE
<50 PPM
>= 50 PPM

IF PCBS ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?

YES ☑ NO

ADDITIONAL HAZARD

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☑ NO (If yes, explain)

ASBESTOS
DEA REGULATED SUBSTANCES
DIOXIN
EXPLOSIVE
HERBICIDE
FUMING / SMOKING WASTE
INFECTIOUS, PATHOGENIC, OR ETIOLOGICAL AGENT
OXIDIZER
OSHA REGULATED CARCINOGENS
PESTICIDE
POLYMERIZABLE
RADIOACTIVE
REDUCING AGENT
SHOCK SENSITIVE
SPONTANEOUSLY IGNITES WITH AIR
THERMALLY SENSITIVE
WATER REACTIVE

☑ NONE OF THE ABOVE

ATTACHMENT 2 Page 2 of 4

CleanHarbors ENVIRONMENTAL SERVICES, INC.

Clean Harbors Profile No. T05324

F. REGULATORY STATUS

☑ YES NO USEPA HAZARDOUS WASTE?
D001 D002 D004 D005 D006 D007 D008 D009 D010 D011 D018 D019 D020 D021 D022 D023 D024 D025

☑ YES NO DO ANY STATE WASTE CODES APPLY?
MA99

☑ YES NO IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?
LDR CATEGORY: *This is subject to LDR.*
VARIANCE INFO:

YES NO IS THIS A UNIVERSAL WASTE?

YES ☑ NO IS THIS A WASTEWATER PER 40 CFR PART 268.2?

YES ☑ NO IF ANY WASTE CODES D001, D002, D003 (OTHER THAN REACTIVE CYANIDE OR REACTIVE SULFIDE), D004-D0011, D012-DO17 NON-WASTEWATERS, OR D018- D043 APPLY, ARE ANY UNDERLYING HAZARDOUS (UHCs) PRESENT ABOVE UNIVERSAL TREATMENT STANDARDS (UTS)?

YES ☑ NO DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES ☑ NO IS THIS WASTE SUBJECT TO CATEGORICAL PRETREATMENT DISCHARGE STANDARDS?
IF YES, SPECIFY POINT SOURCE CATEGORY LISTED IN 40 CFR PART 401.

YES ☑ NO IS THIS WASTE REGULATED UNDER THE BENZENE NESHAP RULES? (IS THIS WASTE FROM A CHEMICAL MANUFACTURING, COKE BY-PRODUCT RECOVERY, OR PETROLEUM REFINERY PROCESS?)

YES ☑ NO DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?

YES ☑ NO DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?

YES ☑ NO DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE GREATER THAN 77 KPa (11.2PSIA)?

YES ☑ NO IS THIS CERCLA REGULATED (SUPERFUND) WASTE ?

YES NO IS THIS WASTE REGULATED UNDER THE OZONE DEPLETING SUBSTANCE ACT FOR ONTARIO?

G. D.O.T INFORMATION: (Include proper shipping name, hazard class and ID number).

US D.O.T. DESCRIPTION:
Hazardous waste, liquid, n.o.s., 9, NA3082, PG III
Non DOT Regulated, NONE, N/A
Non Hazardous, Non D.O.T. Regulated Material, NONE, NONE, NONE

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY: ONE TIME WEEKLY ☑ MONTHLY QUARTERLY YEARLY OTHER *Other*

IF BULK LIQUID OR BULK SOLID PLEASE INICATE THE EXPECTED NUMBER OF LOADS PER SHIPPING FREQUENCY:

☑ CONTAINERIZED
1-80 CONTAINERS/SHIPMENT
STORAGE CAPACITY:
CONTAINER TYPE:
CUBIC YARD BOX
PALLET
TOTE TANK
OTHER:
☑ DRUM SIZE: *55*
CONTAINER MATERIAL:
☑ STEEL
FIBER
PLASTIC
OTHER

BULK LIQUID
GALLONS/SHIPMENT: GAL.
FROM TANKS: TANK SIZE GAL.
FROM DRUMS
VEHICLE TYPE:
VAC TRUCK
TANK TRUCK
RAILROAD TANK CAR
CHECK COMPATIBLE STORAGE MATERIALS.
STEEL | STAINLESS STEEL
RUBBER LINED | FIBERGLASS LINED
DERAKANE
OTHER

BULK SOLID
SHIPMENT UOM: TON YARD
PER SHIPMENT: 0.00 MIN 0.00 MAX
STORAGE CAPACITY TON/YD
VEHICLE TYPE:
DUMP TRAILER
ROLL OFF BOX
INTERMODAL ROLLOFF BOX
CUSCO/VACTOR
OTHER

I. SPECIAL REQUEST

SPECIFIC DISPOSAL RESTRICTIONS OR REQUESTS:
SPECIAL WASTE HANDLING REQUIREMENTS:
OTHER COMMENTS OR REQUESTS:

J. BIENNIAL / ANNUAL REPORTING INFORMATION

SIC CODE *4953* SOURCE CODE *G61* FORM CODE *W204*

K. SAMPLE STATUS

REPRESENTATIVE SAMPLE HAS BEEN SUPPLIED.	YES	SAMPLED BY	DATE SAMPLED	WHERE SENT
	☑ NO		*1/1/1950*	

GENERATORS CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I aslo certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE NAME (PRINT) TITLE DATE

Addendum

F. REGULATORY STATUS (cont.)

ADDITIONAL USEPA HAZARDOUS WASTE?

D026 D027 D028 D029 D035 D039 D040 F001 F002 F003 F004 F005

G. ADDITIONAL D.O.T INFORMATION (cont.): (Include proper shipping name, hazard class and ID number).

US D.O.T. DESCRIPTION: ***Waste Flammable liquids, n.o.s., 3, UN1993, PG III***

ATTACHMENT 2 Page 4 of 4

FL1321/LN194885 ✓

Please print or type. (Form designed for use on elite [redacted]itch) typewriter.)   WH909414 PPW 11/19[redacted]4   Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 3	Information in the shaded areas is not required by Federal law.
KSD007246846	00575		

3. Generator's Name and Mailing Address
Clean Harbors Kansas LLC
2549 North New York Street
Wichita, KS 67219

4. Generator's Phone (316) 269-7400

A. State Manifest Document Number

B. State Generator's ID: SAME

5. Transporter 1 Company Name: Robbie D. Wood
6. US EPA ID Number: ALD067138891

C. State Transporter's ID: MPW 01350504
D. Transporter's Phone: 800 356 7457

7. Transporter 2 Company Name: Clean Harbors Env. Services Inc
8. US EPA ID Number: MAD039322250

E. State Transporter's ID: MPW 18074544
F. Transporter's Phone: 781-849-1800

9. Designated Facility Name and Site Address
Clean Harbors Env Services Inc
2900 Rockefeller Avenue
Cleveland, OH, 44115

10. US EPA ID Number: OHD000724153

G. State Facility's ID

H. Facility's Phone: (216) 429-2402

	HM	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ, WASTE SULFURIC ACID, SPENT, 8, UN1832, PG II (D002)	001	DF	00425	P	D002
b.	X	~~WASTE~~ Revised CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S., (FERRIC CHLORIDE SOLUTION), 8, UN3264, PG III	004	DF	01800	P	NONE
c.							
d.							

J. Additional Descriptions for Materials Listed Above
11a.ERG#137 (L),(C)
11b.ERG#154 (L)

K. Handling Codes for Wastes Listed Above: H077

15. Special Handling Instructions and Additional Information
11a: CLV6678 11b: CH32229
1x55 4x55

CR	✓
FS	
OFC	

EMERGENCY PHONE #: (800) 483-3718

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are ~~in all respects in proper condition~~ for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month Day Year
Nate Embery	[signature]	01 13 05

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
Jeffery LAWley	[signature]	01 17 05

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
Cindy Thacker	Cindy Thacker	01 18 05

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year
J. Dembouske	J Dembouske	02 17 05

Style CF 17 LABELMASTER® (800) 621-5808 www.labelmaster.com   Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.   EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER USING SOYBEAN INK   PRINTED WITH SOY INK

ATTACHMENT 3 Page 1 of 1

ORIGINAL-RETURN TO GENERATOR

III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittee shall use a container made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored or treated, so that the ability of the container to contain the waste is not impaired. [40 CFR 264.172]

III.E. MANAGEMENT OF CONTAINERS

The Permittee shall keep all containers closed during storage, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak. [40 CFR 264.173]

III.F. CONTAINMENT SYSTEM

The Permittee shall operate and maintain the containment system(s) for the container management unit(s) in accordance with the attached plans and specifications, contained in Storage of Containers with Free Liquids - Section D.2 of the Part B permit application. [40 CFR 264.175]

The Permittee shall remove waste spillage, waste leakage, and/or accumulated precipitation from the secondary containment system as soon as practicable or within twenty-four (24) hours.

III.G. INSPECTION SCHEDULES AND PROCEDURES

The Permittee shall inspect the container storage area(s) in accordance with the schedule specified in the Inspection Schedule - Section F-3 of the Part B permit application, to detect leaking containers, deterioration of containers and the containment system(s) caused by corrosion or other factors. [40 CFR 264.174]

III.H. RECORDKEEPING

The Permittee shall place the results of all waste analyses and trial tests and any other documentation showing compliance with the requirements of 40 CFR 264.17(c) and 264.177 in the facility operating record. [40 CFR 264.73]

III.I. CLOSURE

At closure of the container storage area(s), the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system(s), in accordance with the procedures in the Closure Plan - Section J of the Part B permit application and 40 CFR 264.113. [40 CFR 264.178]

Containers may be located within other waste management units and are used to accumulate and store site generated residues such as pump strainer residues, tank bottoms, in-line process materials, incidental spills, discarded Personal Protective Equipment (PPE), etc. CHK will manage these wastes according to the standards set forth in 40 CFR Part 262. Containers of on-site generated wastes will not

be accumulated for more than ninety (90) days within these areas, and will be accumulated in containers complying with 40 CFR 264 Subpart I.

Storage building CMUs have been designed to receive many categories of waste streams in drums, overpacks, gondolas, tote boxes, etc. The number of segregated containment units provides the capability to store various waste types within certain units, and meet the requirements for managing reactive, ignitable and incompatible wastes. Any of the CMUs may be used to store any container type and volume as dictated by operational needs and compatibility requirements. Specifications regarding layout of these buildings are presented later in this section; brief descriptions of each storage building are provided below.

D-1a Building D:

The layout of Building D is designed to accommodate storage of wastes in containers and tanks (tank management is addressed in Section E, Tank Systems).

APPENDIX

PHOTOGRAPHIC LOG

Facility Name: Clean Harbors Kansas LLC
Address/Location 2549 N. New York Wichita, KS 67219
ID/Permit # KSD 007 246 846

Photos taken by Debbie Travis using a Sony digital camera. Photos were not altered except to change the size of the file.

Photo Number: 1
Location: Building C
Weather: Na
Directions: Northeast
Description:

The black 55-gallon storage drum is not labeled with an accumulation start date.

The equipment sitting next to the drum is used to pump out the blind sumps located in some of the buildings.

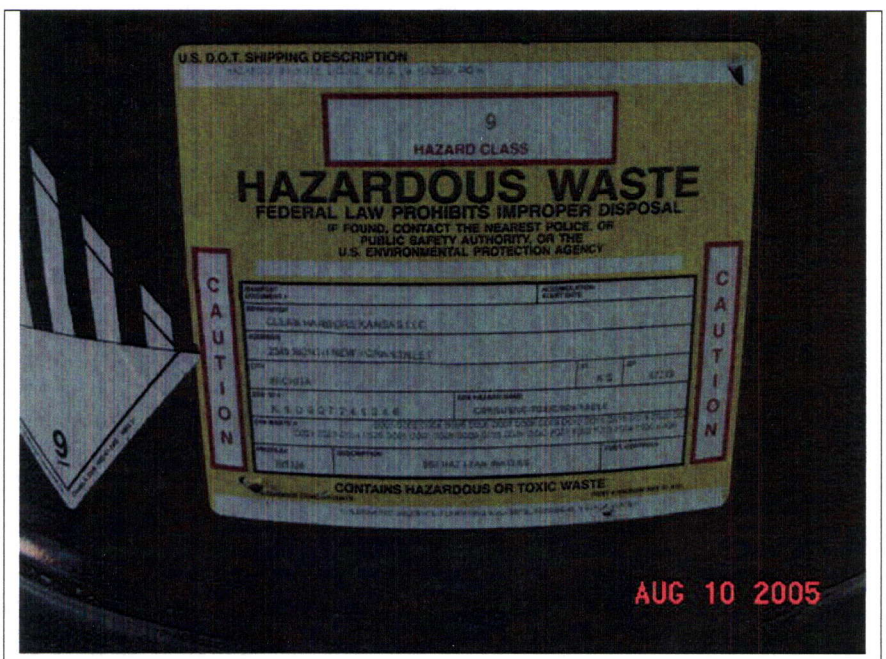


Photo Number: 2
Location: Building C
Weather: Na
Directions: Northeast
Description:

Close-up photograph of the label on the black 55-gallon storage drum shown in photograph 1. There is no accumulation start date.

PHOTOGRAPHIC LOG

Facility Name: Clean Harbors Kansas LLC
Address/Location 2549 N. New York Wichita, KS 67219
ID/Permit # KSD 007 246 846

Photos taken by Debbie Travis using a Sony digital camera. Photos were not altered except to change the size of the file.

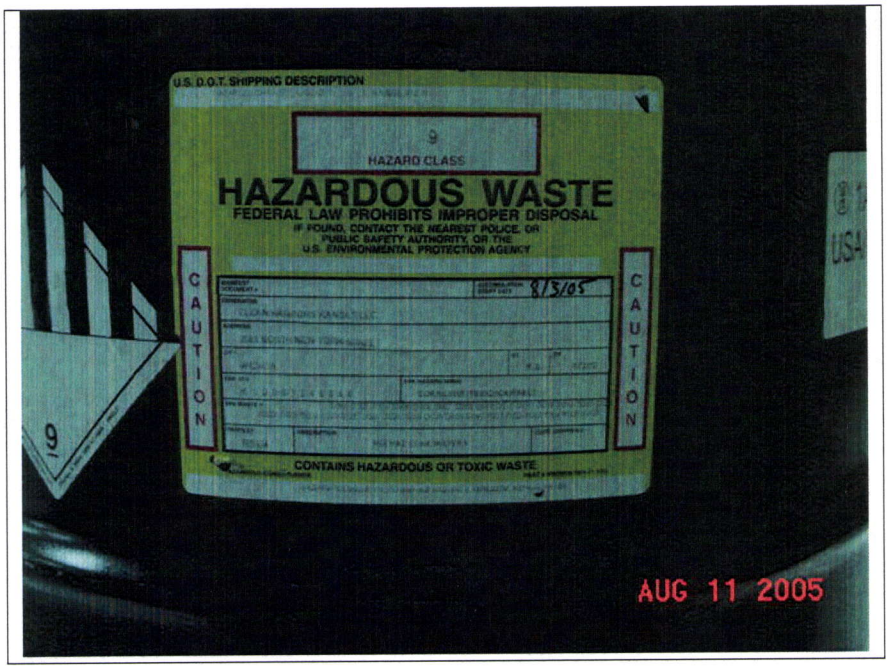


Photo Number: 3
Location: Building C
Weather: Na
Directions: North
Description:

Close-up photograph of the label on the black 55-gallon storage drum shown in photograph 1. 8/3/05 has been marked in the accumulation start date area.

Photo Number: 4
Location: Building J
Weather: Na
Directions: East
Description:

There are two white plastic 5-gallon containers sitting on the catwalk.

PHOTOGRAPHIC LOG

Facility Name: Clean Harbors Kansas LLC
Address/Location 2549 N. New York Wichita, KS 67219
ID/Permit # KSD 007 246 846

Photos taken by Debbie Travis using a Sony digital camera. Photos were not altered except to change the size of the file.

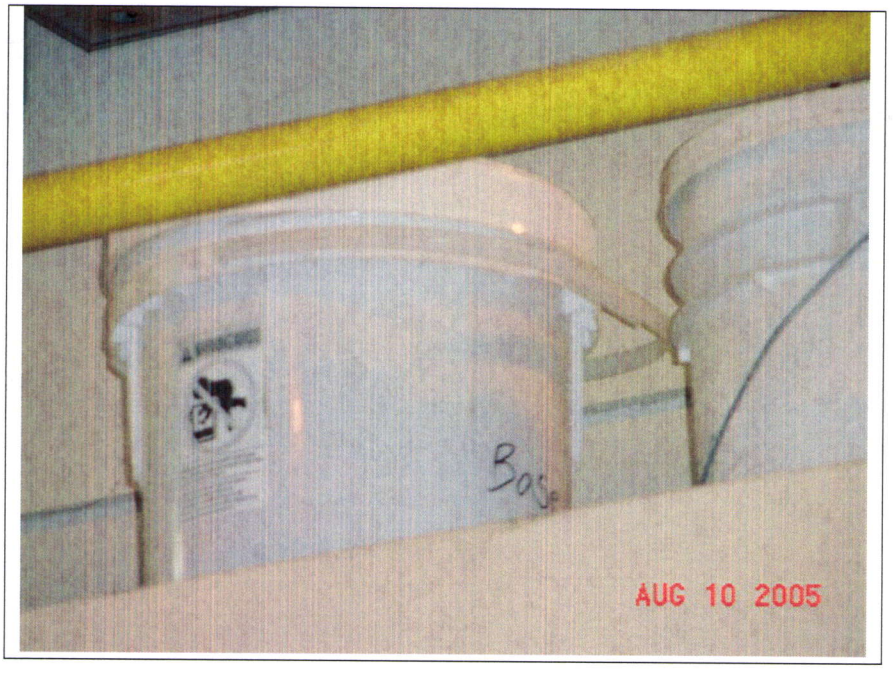


Photo Number: 5
Location: Building J
Weather: Na
Directions: East
Description:

Close-up photograph of the container shown in photograph 1. The container shown on the left was labeled with the word Base. The container was empty.

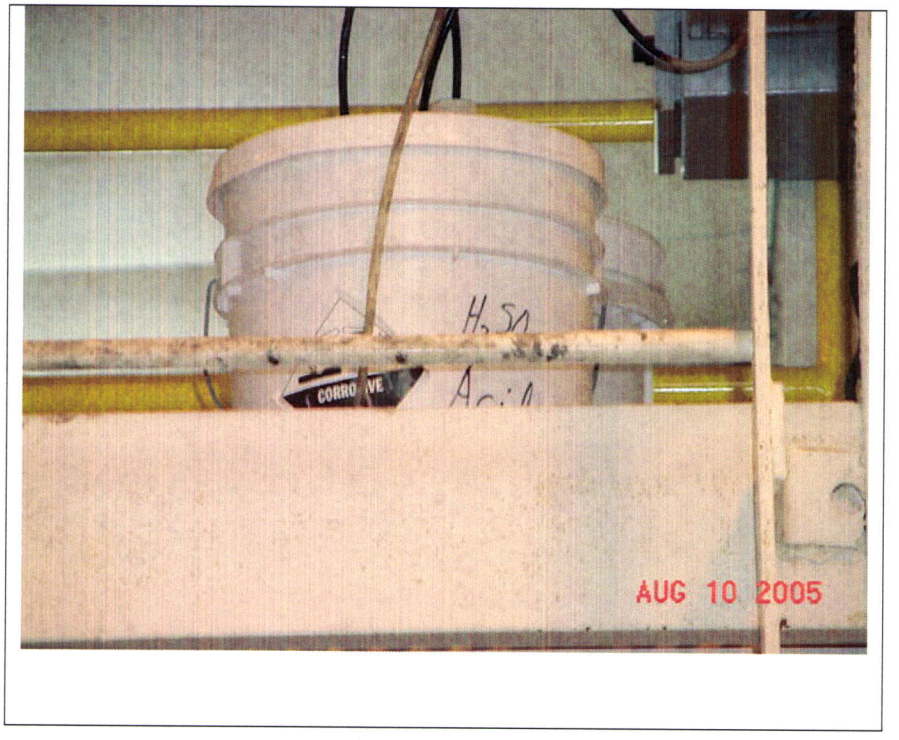


Photo Number: 5
Location: Building J
Weather: Na
Directions: North
Description:

Close-up photograph of the container shown on the right in photograph 1. The container was labeled with the word Acid. The container contained approximately 2 to 3 gallons of liquid. Hoses were protruding through a hole in the lid.

PHOTOGRAPHIC LOG

Facility Name: Clean Harbors Kansas LLC
Address/Location 2549 N. New York Wichita, KS 67219
ID/Permit # KSD 007 246 846

Photos taken by Debbie Travis using a Sony digital camera. Photos were not altered except to change the size of the file.

Photo Number: 7
Location: Building J
Weather: Na
Directions: East
Description:

The white 5-gallon container of hazardous waste that was located in building C has been moved to building J. The container was closed and labeled.

The black 55-gallon storage drum is the same drum that was shown in photograph 1.

The gold drums are empty over-pack drums.

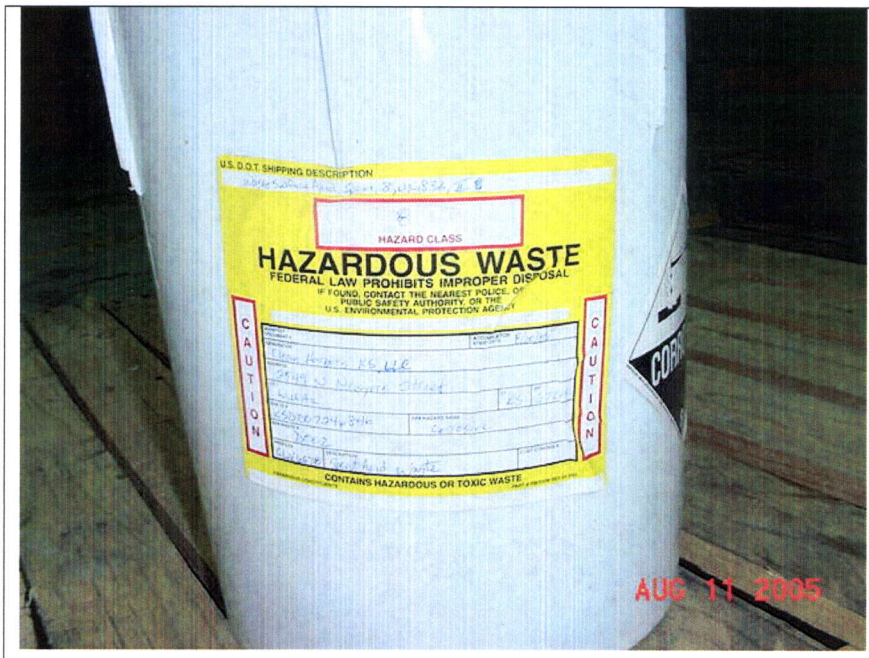


Photo Number: 8
Location: Building J
Weather: Na
Directions: East
Description:

Close-up photograph of the 5-gallon white storage container shown in photograph 7.